



May 2024 Metering Services Review Package 1 Consultation

Draft 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 and consultation notice

The publication of this Draft Report commences the second stage of the standard rules consultation procedure conducted by AEMO (**Consultation**) to consider the changes (**Changes**) which are proposed (**Proposal**) to the Retail Electricity Market Procedures (**REMPs**) under the National Electricity Rules (**NER**), which relate to:

1. The implementation of the Draft Rule of the Australian Energy Market Commission (**AEMC**) on Accelerating Smart Meter Deployment (**ASMD**).¹
2. The AEMO review of the processes for Retailers of Last Resort (**RoLR**).
3. The following three Issues and Change Forms (**ICFs**) raised by the Electricity Retail Consultative Forum (**ERCF**):
 - ICF-077 Auto population of the Last Consumer Change Date (**LCCD**) based on NMI status.
 - ICF-078 Alignment of Addressing in B2M Procedures to AS4590.1:2017.
 - ICF-079 NEM 12 MDFF Inconsistencies.
4. Embedded Network settlement anomalies.

Issues Paper

The Issues Paper published on the 29 May 2024 was based on the Draft Rule published by the AEMC and sought feedback on four items:

1. Accelerating Smart Metering Deployment

Legacy Meter Replacement Plan

A new NMI standing data attribute to record the LMRP date in MSATS. AEMO proposed options for industry to consider the following elements of the new data attribute of LMRP:

- The date format of the field (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY).
- The mechanism to update the LMRP date in standing data by using the Blind Update Tool or Change Requests

Defect Management Process

The creation of new attributes in MSATS to allow:

- The Metering Coordinator (MC) to flag a defect at site.
- The FRMP to record the notifications to a customer to remediate the site defect.

¹ <https://www.aemc.gov.au/rule-changes/accelerating-smart-meter-deployment>

Terminology

Changes to several procedures and documents to accommodate new terminology and modification to reflect the defect obligations for the MC to note in MSATS sites where a defect has been found that prevents a legacy meter being exchanged.

2. RoLR

The removal of 13 reports which are considered no longer relevant to participants.

3. Issues and Change Forms

- The auto-population of the LCCD based on the NMI status for greenfield sites.
- Alignment of addressing in B2M procedures to AS4590.1:2017.
- Changes to the MDFF specification to remove the inconsistent obligation between clauses 4.4 and 4.5.

4. Embedded Network Settlement Anomalies

To remove the ability of an Embedded Network Manager (ENM) to activate or de-activate child NMIs retrospectively and remove the ability of an MDP to activate and de-activate datastreams of a child NMI retrospectively.

Industry Responses to Issues Paper

In response to the Issues Paper, AEMO received 16 responses in respect of the Proposals, which raised the following material issues:

- Different proposals of the date format of the LMRP field.
- Clarification of the reports which are slated to be removed as part of RoLR.
- Objection to the removal of an ENM's ability to retrospectively de-activate or re-activate child NMIs and for the MDP to retrospectively activate and de-activate datastreams of a child NMI retrospectively.

Further, AEMO:

- Received feedback from the B2B WG to include an Originating MC as part of the Defect Management process.
- Instigated discussions with Intellihub, Origin Energy and PlusES to discuss their concerns with the proposals in the Issues Paper of Embedded Network Settlement Anomalies.
- Received a request to clarify how the reports for RoLR were determined to be removed.

Changes from Draft Rule to Final Rule

On 4 July 2024, the AEMC delayed the ASMD's final rule's publication to 28 November 2024. The delay was due to stakeholders' concerns about unexpected tariff changes occurring after installing a smart meter. As a result of the delay, the effective date of the rule commencement has changed. The new dates are:

- 26 October 2025: DNSPs to begin populating LMRP into MSATS
- 1 December 2025: Acceleration component of the rule.
- 1 July 2026: Power Quality Data.

In addition to the delay of the effective dates, there is a change in the defect management process from the draft rule to the final rule. The changes include:

- removal of recording the date of notices issued to a customer as part of the defect process in MSATS;
- requirement on the retailer to restart the defect process on retailer or customer churn; and
- inclusion of defect type in MSATS to describe the nature of the defect at the metering installation.

This draft determination includes these changes.

Draft Determination

After considering the responses received, AEMO's draft determination is to implement Changes to Procedures in respect of:

Accelerating Smart Metering Deployment

- Apply a date format of DD-MM-YYYY to reflect the last day a LMRP NMI must be replaced, which can be completed via the Blind Update Tool (BUT) or Change Request (CR).
- For AEMO to coordinate DNSPs populating the LMRP field into MSATS from 26 October 2025 to 27 November 2025.
- Include a new attribute of Originating MC to identify the MC who applied the defect flag in MSATS
- Include a new enumerated list of 'Defect Type' to identify the nature of the defect at the metering installation encountered by the MC which prevented a legacy meter being replaced.
- Introduce new Standing Data Quality reports to assist industry with compliance reporting.

RoLR

- Remove 13 RoLR reports that are no longer required.
- Update the RoLR Procedure Part A to correct cross references and to improve overall readability of the procedure.
- Remove references to use of password protected emails to deliver RoLR reports to allow delivery of reports to be aligned with other MSATS reports.

Issues and Change Forms

- **ICF-077 Auto population of the LCCD based on NMI status.**

AEMO to auto populate the LCCD field when a NMI is activated from Greenfield status to Active status.

- **ICF-078 Alignment of Addressing in B2M Procedures to AS4590.1:2017**

Align the address standard in B2M Procedures with the AS4590.1:2017 standard, superseding the current NEM addressing, which is based on the AS4590-1999 standard. The alignment at this stage is to fix the following types of discrepancies.

- Field Length Discrepancies - Changes in the field length of address elements within AS4590.1:2017.

- Enumerated Value Inconsistencies - Discrepancies in enumerated values for address elements.
- **ICF-079 NEM 12 MDFF Inconsistencies**
Remove the inconsistency between clauses 4.4 and 4.5 of the Meter Data File Format Specification NEM12 & NEM13 (**MDFF Specification**) relating to the provision of 400 block data for actual reads.

Embedded Network Settlement Anomalies

Remove the ability of an MDP to retrospectively make active or de-activate data-streams on an existing embedded network child connection.

Proposed Effective Dates

On 28 November 2024 the AEMC published its Final Rule Determination for the Accelerated Smart Meter Deployment. The Final Rule requires AEMO to amend MSATS to specify the information that must be recorded for the DNSP to populate the LMRP field by 26 October 2025.

AEMO proposes the following effective dates:

26 October 2025

- Make an effective date of the MSATS Procedures: Principles and Obligations for All Connection Points and Standing Data for MSATS for 26 October 2025 to allow the DNSP to populate the LMRP field in MSATS by 27 November 2025.

1 December 2025

- Make an effective date of 1 December 2025 for the MSATS Procedures: Principles and Obligations for All Connection Points and Standing Data for MSATS for:
 - Defect Management Process
 - ICF-077, ICF-078
 - Embedded Network Settlement Anomalies.
- An effective date for the MDFF specification of 1 December 2025
- Remove the reports outlined in the Issues Paper for Retailer of Last Resort event.

Procedures Requiring Amendment

The following Procedures and documents are the subject of the Proposals:

- Retail Electricity Market Procedures - Glossary and Framework (**Glossary and Framework**)
- MSATS Procedures: Principles and Obligations for All Connection Points (**MSATS Procedure**)
- Standing Data for MSATS document (**Standing Data for MSATS document**)
- Meter Data File Format Specification NEM12 & NEM13 (**MDFF**)
- Guide to the Role of the Metering Coordinator (**MC Guide**)
- Service Level Procedure Embedded Network Manager services (**ENM Procedure**)
- NEM RoLR Processes Part A - MSATS Procedure: RoLR Procedures (**RoLR Procedure**)

Consultation notice

AEMO invites written submissions from interested persons on the Proposal and issues identified in this Draft Report to NEM.Retailprocedureconsultations@aemo.com.au by 5:00pm (Melbourne time) on 2 February 2025.

All submissions must be forwarded in electronic format (both pdf and Word). Please send any queries about this Consultation to the same email address.

Submissions may make alternative or additional proposals you consider may better meet the objectives of this consultation and the national electricity objective in section 7 of the National Electricity Law (NEL). Please include supporting reasons.

Before making a submission, please read and take note of AEMO's consultation submission guidelines, at <https://aemo.com.au/consultations>. Subject to those guidelines, submissions will be published on AEMO's website.

Please identify any parts of your submission that you wish to remain confidential and explain why. AEMO may still publish that information if it does not consider it to be confidential but will consult with you before doing so. Material identified as confidential may be given less weight in the decision-making process than material that is published.

Submissions received after the closing date and time will not be valid. AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Interested persons can request a meeting with AEMO to discuss any particularly complex, sensitive or confidential matters relating to the Proposal. NER 8.9.1(k) set out details. Meeting requests must be received by the end of the submission period and include reasons for the request. We will try to accommodate reasonable meeting requests but, where appropriate, we may hold joint meetings with other stakeholders or convene a meeting with a broader industry group. Subject to confidentiality restrictions, AEMO will publish a summary of matters discussed at stakeholder meetings.

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1. Stakeholder consultation process

As required by the NER, AEMO is consulting on the Proposal in accordance with the standard rules consultation procedure in NER 8.9.2.

This Draft Report uses terms defined in the NER, which are intended to have the same meanings. A glossary of additional terms and abbreviations is in Appendix A.

AEMO’s timeline for the Consultation has changed since the publication of the Issues Paper. On 4 July 2024, the AEMC published its notice to extend the date to make its final determination from 11 July 2024 to 28 November 2024 because of negative feedback to the draft determination due to retail tariff changes when a smart meter is installed.

Given the AEMC Extension, under NER 8.9.2(d) and (e), AEMO extended the publication of the Draft Determination to 18 December 2024 because of a material change in circumstance. This date was chosen on the basis of no material change from the draft determination to the final determination. The Final Rule has maintained the key features of the draft rule which was the basis of AEMO’s consultation on 29 May 2024.

Indicative process and timeline for the Consultation are outlined below. Future dates may be adjusted, and additional steps may be included, if necessary, during the Consultation.

Table 1 Consultation process and timeline

Consultation steps	Dates
Consultation Paper published	29 May 2024
Submissions due on Consultation Paper	11 July 2024
Draft Report published	18 December 2024
Submissions due on Draft Report	19 February 2025
Final Report published	2 April 2025

AEMO’s consultation webpage for the Proposal is at <https://aemo.com.au/consultations/current-and-closed-consultations/2024-metering-services-review-package-1>. The website contains all previous published papers and reports, written submissions, and other consultation documents or reference material.

In response to its Issues Paper on the proposal, AEMO received 16 written submissions. Since the responses to the submissions, AEMO has:

- Received feedback to the defect management process by the B2B WG to request Originating MC is included in the Business to Market systems, to assist with the Business to Business processes for defect management.
- Published a Final High Level Implementation Assessment outlining AEMO’s overview of the potential procedural impact, high level system impact and implementation pathway impact.
- Engaged with interested parties about the embedded network settlement anomalies proposal.

AEMO thanks all stakeholders for their feedback on the Proposal to date. AEMO has considered this feedback in preparing this Draft Report. AEMO looks forward to further constructive engagement.

2. Background

2.1. Context for this consultation

This consultation considers **Changes** to the REMPs which relate to:

- The implementation of the Draft Rule of the Australian Energy Market Commission (**AEMC**) on Accelerating Smart Meter Deployment (**ASMD**).²
- The AEMO review of the processes for Retailers of Last Resort (**RoLR**).
- Three Issues and Change Forms (**ICFs**) raised by the Electricity Retail Consultative Forum (**ERCF**):
 - ICF-077 Auto population of the Last Consumer Change Date (**LCCD**) based on NMI status.
 - ICF-078 Alignment of Addressing in B2M Procedures.
 - ICF-079 NEM 12 MDFF Inconsistencies.
- Embedded Network settlement anomalies.

ASMD Rule

The AEMC made the ASMD Rule determination on 28 November 2024, to accelerate smart-meter deployment in the NEM from 2025 to 2030.³ Accelerating the deployment of smart meters provides a digital platform for the energy system as the energy landscape changes with increasing Consumer Energy Resource integration into the NEM.

The ASMD Final Rule has two overarching objectives:

- Accelerate the deployment of smart meters in the NEM.
- Enable the provision of power quality data from smart meters to DNSPs.

These overarching objectives are supported by a series of reforms aimed at assisting the deployment of smart meters, minimising the costs for industry and consumers, and ensuring customers can gain the full suite of benefits that smart meters provide.

The ASMD Draft Rule staggers the implementation of its reforms into two commencement dates:

1 December 2025

Commencement of the Legacy Meter Replacement Plan (LMRP), site defect process, metering installation malfunction framework, introduction of the Shared Fusing procedure and testing and inspection framework to allow AER and AEMO to amend and publish procedures, guidelines and other document to account for the ASMD Rule.

² <https://www.aemc.gov.au/rule-changes/accelerating-smart-meter-deployment>

³ On 4 July the AEMC announced an extension to the final determination date to the 28 November 2024, as a result of customer feedback to the draft determination about the potential negative feedback of retail tariff changes after the installation of a smart meter.

1 July 2026

Commencement of the provision of Power Quality Data from the Metering Coordinator to the DNSP for small customer metering installations.

In consultation with industry, AEMO split the consultation into three packages of work related to; acceleration of smart meters, testing and inspection and power quality data. The Issues Paper published on 29 May 2024 considered the ASMD draft Rule on the impact to AEMO's systems and Procedures for the acceleration part of the change, specifically:

1. LMRP – the Final Rule requires DNSPs to populate MSATS with the date a type 5 or type 6 meter (Legacy meter) must be exchanged with a smart meter
2. Defect Management – Metering Coordinators (MCs) must flag in MSATS when a defect is found at site which prevents a legacy meter being replaced with a smart meter and a record keeping process of customer notification a retailer must complete in MSATS as a record keeping measure.

There is a change to the defect management process from the draft rule to the final rule and, accordingly, a change to the detail published in the Issues Paper on 29 May 2025. The changes include:

- removal of notices issued to a customer in MSATS as part of the defect process;
- requirement of the retailer restarting the defect process on retailer or customer churn; and
- inclusion of defect type to describe the nature of the defect at the metering installation.

This Draft Report includes these changes.

Legacy Meter Replacement Plan

The AEMC has initiated a regulatory change that requires networks to phase out their legacy meters from 2025 to 2030. Specifically, the objective of the LMRP is for retailers and Metering Coordinators to replace all existing type 5 and type 6 meters with type 4 meters by 1 December 2030. The LMRP applies to small customers in Queensland, New South Wales, Australian Capital Territory and South Australia which have a type 5 or type 6 meter.

The ASMD Final Rule requires that AEMO, by no later than 26 October 2025, update the Market Settlement and Transfers Solution procedure to record information in relation to an approved LMRP.

Metering Installation Defects

Metering installation defects are a barrier to the installation of smart meters. The ASMD Final Rule prescribes a new process for Metering Coordinators to record if there is a metering installation defect in MSATS. This process will be an ongoing arrangement beyond the acceleration period for legacy meters.

The new process requires that:

- A Metering Provider identifies a defect at the metering installation preventing a meter exchange and leaves a defect notice with the customer.
- The Metering Provider notifies the Metering Coordinator of the defect.
- The Metering Coordinator records in MSATS that there is a defect at the metering installation and the defect type.

The draft rule requirement to record retailer notifications to the customer is removed from MSATS. The effective date of the metering installation defect process is 1 December 2025.

Retailer of Last Resort

During a RoLR event, AEMO produces a total of 31 report types which are transmitted to a variety of internal and external stakeholders.

The functionality to generate these reports does not operate as originally intended. Accordingly, significant involvement of AEMO operational staff is required to modify the reports before transmission to participants. Before investing time to improve the RoLR report functionality, AEMO, from an operational perspective, reviewed the functionality, concluding that:

- Some reports are no longer relevant, for example a tier one participant report.
- Some reports that are produced may not be needed by participants, for example, summary reports.
- The reports produced should be highly automated, so that in the case of a significant retailer failure:
 - AEMO does not risk failing to meet its obligations under the NEM RoLR Processes Part A – MSATS Procedure: RoLR Procedures (**RoLR Procedures**).
 - Information can be disseminated around the market as soon as possible.

Issues and Change Forms

ICF-077 Auto population of the LCCD based on NMI status

From 1 November 2023, all Current FRMPs have obligations to maintain the LCCD field within MSATS, in accordance with the MSATS Procedures. The LCCD field has been introduced by AEMO to better support the intent of the CDR Rule. Specifically, the LCCD field enables customers to access data which spans multiple retailers at the same NMI.

For newly-created NMIs, the Current FRMP must populate the LCCD. The LCCD is easily identifiable. Accordingly, AEMO could automatically populate the LCCD as part of the NMI update process, thereby removing the requirement for every retailer to build the same system and process logic to populate those NMIs.

In assessing ICF-077, the following factors were considered:

- Over 300,000 new NMIs are connected annually, necessitating updates as they transition from 'Greenfield' to 'Active'.
- Retailers must independently update the LCCD for new NMIs, leading to industry-wide redundancy.
- The requirement to update the LCCD field involves significant transactional volume and manual processing, particularly impacting smaller retailers.

ICF-077 proposes that AEMO will auto-populate the LCCD field as part of the NMI update process, resulting in the following benefits:

- Reduced number of processes that retailers must manage, reduced service costs and reduced information timeframes.
- Reduced requirements of participants, reduced transactional burdens, and reduced needs for participants to routinely check the relevant information.
- Increased accuracy and compliance.

ICF-078 Alignment of Addressing in B2M Procedures to AS4590.1:2017

ICF-078 proposes to align the address standard in B2M Procedures with the AS4590.1:2017 standard, superseding the current NEM addressing, which is based on the AS4590-1999 standard.

Currently, this alignment is being reviewed more broadly by both Gas and Electricity (B2B and B2M) retail markets.

The AS4590-1999 standard has the following shortcomings:

- Truncation of longer address fields, risking capturing incomplete and inaccurate address data in NMI Standing Data.
- Increased manual corrections and data discrepancies, leading to operational inefficiencies.
- Impaired integration for new market entrants that have moved to the latest standards.
- Restrictions to the adoption of future technological advancements.

AEMO's audit of the current NEM address standard against the AS4590.1:2017 standard identified the following discrepancies:

- Category 1 - NEM Only - Some NEM addressing elements sit outside of AS standards.
- Category 2 - Minor Discrepancies - Instances of either no discrepancy or minor changes in field names, where the core concepts, meanings, character lengths, data types, and usage rules remain consistent with NEM standards.
- Category 3 - Methodology Variances - Different methods used to assemble individual address elements. Despite these variances, the final structure of the addresses aligns well, with no significant impact on the result.
- Category 4 - Field Length Discrepancies - Changes in the field length of address elements within AS4590.1:2017. Such modifications may lead to truncated address information during data exchanges between systems following NEM and AS4590.1:2017 standards.
- Category 5 - Enumerated Value Inconsistencies - Discrepancies in enumerated values for address elements could introduce data constraints. This may result in the non-acceptance of AS4590.1:2017-compliant addresses in the NEM B2M system.

The alignment to AS4590.1:2017 will:

- Ensure accurate, complete address data, leading to better service delivery and customer trust.
- Harmonize data standards between B2B and B2M, reducing operational errors and the potential for data discrepancies, leading to cost savings.

ICF-079 NEM 12 MDFF Inconsistencies

The MDFF Specification NEM 12 has an inconsistent obligation relating to the provision of 400 block data for Actual reads. AEMO has identified the inconsistency between clauses 4.4 and 4.5 of the MDFF Specification.

This inconsistency has led to different interpretations amongst participants as to how a NEM 12 should be formatted. Consequently, some parties have data rejected, requiring them to make software changes in their systems to accommodate the alternate interpretations of the MDFF.

Accordingly, ICF-079 proposes to remove the inconsistency between clauses 4.4 and 4.5 of the MDFF Specification. This removal should harmonise the different interpretations as to how the MDFF Specification NEM 12 should operate, which in turn will reduce costs, avoid delays to importing data and minimise disagreements with service providers on how data should be provided.

Embedded Network settlement anomalies

In its draft determination for the 'Unlocking CER benefits through flexible trading' rule change, the AEMC acknowledged AEMO's concern about settlement and gaming anomalies during system outages for SGA connections within embedded networks. AEMO has identified the opportunity for an SGA connection within an embedded network to be used to gain value from what AEMO considers to be an unintended application of retrospective NMI activation and deactivation in the settlements process.

AEMO propose limiting the ability of enabling MDPs to retrospectively activate and de-activate datastreams of an existing child NMI in an embedded network.

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) and, where considering options, to 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; and
- (c) the achievement of targets set by a participating jurisdiction—
 - (i) for reducing Australia's greenhouse gas emissions; or
 - (ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.

3. List of material issues

The key material issues arising from the proposal or raised in submissions or consultation meetings are listed in the following table:

Table 2 List of material issues

No.	Issue	Raised by
1.	Matters associated with the LMRP field	Multiple responses
2.	Defect Management	Multiple responses
3.	Retailer of Last Resort	Multiple responses
4.	Issue and Change Forms	Multiple responses
5.	Embedded Network Settlement Anomalies	Multiple responses
6.	Other Matters – B2B Change to Glossary and Framework	B2B-WG

A detailed table of issues raised by stakeholders in written submissions to the consultation paper, together with AEMO’s responses, is contained in Appendix B.

Each of the material issues in Table 2 is discussed in Section 4.

4. Discussion of material issues

4.1. Matters associated with the LMRP field

4.1.1. Issue summary and submissions

The ASMD Rule requires DNSPs to record approved LMRPs in MSATS. It provides flexibility in AEMO's procedures to specify the information that must be recorded in MSATS for an approved LMRP. The Issues Paper proposed creating a single date field in MSATS, defining when the NMI and associated meters will be replaced as part of the LMRP. Feedback to the questions posed to the Issues Paper included:

- the date format;
- how the data should be loaded into MSATS;
- if AEMO coordination is required to assist participants in loading the data into MSATS; and
- reporting that will assist participants with regulatory obligations.

LMRP date format

Respondents provided a range of options for the date format which can be grouped into the following categories:

- YYYY.
- DD/MM/YYYY.
- Alpha and date format, for example Q1 2026.

Several respondents suggested using the YYYY format for this field, as it is easy to use and can be integrated into administrative processes. Respondents who suggested this format requested that the YYYY correspond to the financial year. For example, a meter in the 2025/2026 year would be represented as 2026.

Those respondents who proposed an alpha and date format believed this approach would allow a more targeted approach of removing meter reading routes and clearly identify which areas metering businesses should allocate resources to. Nonetheless, several participants also did not support this approach. Bluecurrent believed that it would be unlikely a metering provider would be able to construct a program that would meet the quarter requirement because resource availability will vary between metering providers, and this will be the primary driver for the timing of meter exchanges over the year.

The DD/MM/YYYY field was supported by those who saw it representing the last day of the financial year and aligning with the business-to-business format. For those participants supporting this format, Origin Energy and PlusES suggested a standard definition of LMRP that would clearly identify the purpose of the field in MSATS for industry.

How the LMRP date should be loaded in MSATS and AEMO coordination

The final rule requires the DNSP to load their approved LMRP into MSATS from 26 October 2025 to 27 November 2025. AEMO anticipates that approximately 4 million NMIs will need an assigned LMRP date by 27 November 2025. The Issues Paper proposed using the Blind Update Tool (BUT) to update the LMRP field. This tool provides approximately 400,000 NMIs per file and does not create Change Requests.

As part of the LMRP update in the Issues Paper, AEMO asked participants if the LMRP should be created via change request in addition to the Blind Update Tool, and if AEMO should coordinate the load process to minimise the impact on system performance.

Standard Data Quality (SDQ) reports

Those respondents who requested standing data quality reports, saw value in the new fields being created which report on volume of legacy meters replaced, NMIs with metering installation defects, and reporting to ensure all DNSPs have loaded their LMRP against type 5 and type 6 meters. AGL thought that finalisation of the reporting should occur once the final determination is made; Origin recommended the new standing fields created for LMRP should be the basis of the reports.

4.1.2. AEMO's assessment

LMRP date format

AEMO published the Issues Paper at the draft Rule stage. The draft Rule proposed a LMRP broken into five interim periods; each DNSP was to submit their LMRP programs into financial year periods. The Final Rule now begins the acceleration from 1 December 2025. Whilst a YYYY field can provide a proxy for each interim period, it may create confusion for participants to know when a legacy meter is scheduled for replacement. AEMO agrees with some participants that an alphanumeric format may unduly force participants to allocate resources inefficiently. A DD/MM/YYYY format clarifies to the industry the date a legacy meter must be attempted to be replaced. AEMO agrees with Origin and PlusES that the field should include a standard definition to articulate its purpose.

How the LMRP date should be loaded in MSATS and AEMO coordination

AEMO agrees with participants to allow the BUT to update the LMRP field in MSATS. Although some responses did not see a need for a participant to create a LMRP via a change request, AEMO has proposed an additional field in the CR 5000 series for the DNSP to update the LMRP field. This field may provide additional flexibility for a DNSP to modify an NMI with a LMRP.

Participant responses to AEMO coordination for DNSPs to load data into MSATS was mixed. Nonetheless, given the large volume of NMIs to be loaded into MSATS over a four week period, AEMO proposes to provide this service as part of the implementation approach to mitigate any potential business risks.

Standing Data Quality Reports

Standing Data Quality Reporting can assist participants in meeting their regulatory obligations. By providing access to standing data quality reporting, retailers can support the AER's annual performance reporting requirements in near real-time. AEMO has considered those new elements introduced as part of the LMRP to assist participants with their obligations. Origin Energy recommended new reporting based on the new standing data field created due to the ASMD rule. Responses to this question aimed to ensure the LMRP field is populated by the DNSP by 1 December 2025 and to provide reporting of LMRP NMIs not exchanged in the timeframe.

4.1.3. AEMO's conclusion

Following assessment of submissions and further review of the LMRP field, AEMO's draft determination is to:

- Define Legacy Meter Replacement as ‘the last day a legacy meter scheduled for an approved LMRP is to be replaced’.
- Format of the LMRP field: DD/MM/YYYY.
- Require the DNSP, affected by the ASMD rule, to use the Blind Update Tool to populate the LMRP field from 26 October 2025 to 27 November 2025.
- Modify the existing CR 5050/5051 to allow a DNSP to make a retrospective or prospective change to populate the LMRP field to be effective from 1 December 2025
- Coordinate with DNSPs to load LMRP data into MSATS from 26 October 2025 to 27 November 2025.
- Create the following SDQ reports:
 - (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no metering installation defect.
 - (2) 'BASIC' or 'MRIM' sites without an LMRP date.
 - (3) Not ('BASIC' or 'MRIM') meters with an LMRP date.

4.2. Defect Management

4.2.1. Issue summary and submissions

The ASMD Final Rule prescribes a new process for Metering Coordinators to record the metering installation defect, and type of metering installation defect in MSATS. This is a change from the draft rule, which required MSATS to record the customer notifications and did not include the requirement of the MC to record the defect type at the metering installation.

In the Issues Paper AEMO proposed:

- A new Defect Flag standing data attribute, providing the MC with the ability to record a defect in MSATS.
- Two new standing data attributes for the FRMP to meet the obligation of the rule establish a customer notification and industry record keeping process.
 - (a) Site Remediation Status: tracks the notification to the customer and the outcome of site defects.
 - (b) Site Remediation Date: the date the notice was issued to the customer or the date the customer information the retailer the defect was rectified.

The final rule has:

- removed the obligations on FRMPs to record the customer notifications in MSATS; and
- included a new requirement for the type of defect at the metering installation to be recorded.

AEMO’s assessment now removes the requirements to capture site remediation status and site remediation date and include defect type.

4.2.2. AEMO’s assessment

Responses to the Issues Paper highlighted two relevant issues remaining of the final rule; this assessment also includes defect type at the metering installation.

Original MC

During pre-consultation with the industry, participants requested an added data element in MSATS of 'Original MC' to identify the MC who recorded the defect. The purpose of the field would allow a retailer to determine the MC who recorded the defect at the metering installation and provide an avenue for the FRMP to contact the metering coordinator about the nature of the defect at the metering installation via business-to-business or off-market processes.

The Issues Paper did not propose to include the attribute of Original MC; however, it did provide participants with the opportunity to respond to any new data elements that could facilitate the process of identifying and remediating defects.

Several responses to the Issues Paper requested that Original MC be included as a new attribute. In addition, at the August 2024 B2B-WG meeting, the working group requested this field be included in MSATS as a critical piece of data to allow the retailer to identify who the MC was who identified the defect.

Removing populated Defect Fields

AEMO proposed three options in the Issues Paper to consider the treatment of the fields after a smart meter has been installed which had a defect.

Option 1:

- For 3004/3005 or 3090/3091 only, where a legacy meter has been replaced on-site, the Defect Flag, Site Remediation Status and Date will be set to Null by AEMO.

Option 2:

- A specific CR will be created that allows the MP/C to set Defect Flag to Null. When this is submitted, the Site Remediation Status and Date will be set to Null by AEMO.

Option 3:

- Where a legacy meter has been replaced:
 - The MP/MC sets the Defect Flag to Null.
 - The FRMP sets the Site Remediation Status and Date to Null.

The Final rule has removed obligations on FRMPs to record the customer notifications in MSATS and includes a new requirement for the type of defect at the metering installation to be recorded. AEMO proposes option 1 and 3 to describe:

Option 1:

- 3004/3005 or 3090/3091, where a legacy meter has been replaced on-site, the Defect Flag and Defect Type will be set to Null by AEMO.

Option 3:

- Where a legacy meter has been replaced:
 - The MP/MC sets the Defect Flag and Defect Type to Null.

Defect Type

The Final Rule allows for a defect type to be created in MSATS, where a defect is defined as ‘a defect with an end user’s housing of a *metering installation* or electrical wiring connected to the *metering installation* that means the *metering installation* is unable to be repaired or replaced.’

AEMO proposes to use the enumerated values detailed in the 3.9 version of the B2B Service Order Process, except for ‘NOFUSE’ which may not meet the definition in the rules. AEMO has maintained the position of the Issues Paper of including a defect flag.

4.2.3. AEMO’s conclusion

Based on feedback to the Issues Paper and changes from the draft rule to the final rule, AEMO proposes the following for Defect Management:

Original MC

AEMO proposes to include a new attribute of Originating MC to be populated by the MC when raising the defect flag. The field will be mandatory when the MC raises the defect flag. This field will only be visible to the current FRMP and not part of NMI Discovery. The current retailer can use this field to identify who the MC was who identified the defect and then utilise B2B process or off-market processes to notify the MC if further information is required about the nature of the defect.

Defect Type

AEMO proposes to include a new attribute of Defect Type to be populated by the MC when raising the defect flag. The field will be mandatory when the MC raises the defect flag of the metering installation.

To support the maintenance of the new defect attributes AEMO proposes to create a new MSATS change request, 5300/5301 to allow the MC to populate a defect flag in MSATS and apply the defect type.

AEMO proposes to include the following enumerated list in MSATS for Defect Type.

- ASBESTOS: Friable asbestos is present and must be removed
- BOXDAMAGED: The meter box is damaged or not weatherproof.
- ISONCOM: An isolation device (non-service fuse) is present but cannot be operated.
- LIVEWIRING: Suspected exposed terminals or parts behind panel making opening of panel unsafe.
- NOSPAC: The existing metering installation cannot accommodate all metering equipment and must be upgraded.
- PANELLOC: The current location of meter panel is non-complaint and must be relocated.
- PANELNCOM: Meter panel is non-compliant and must be upgraded.
- WIRINGDET: Damaged or deteriorated wiring; includes presence of Vulcanised Indian Rubber (VIR) cables.
- WIRINGNCOM: Non-compliant wiring identified including earthing system issues that must be repaired.

Removing populated Defect Fields

Options 1 and 2 provide automation, reducing industry costs. Option 3 maintains the status quo for creating and maintaining the fields. The changes from the draft rule to the final rule has removed Site Remediation status and Site Remediation date as fields in MSATS. AEMO proposes to include

Originating MC and Defect Type as new attributes the MC must apply in MSATS as part of the defect process.

AEMO proposes option 1 for 3004/3005 or 3090/3091, where a legacy meter has been replaced on-site, AEMO will nullify the Defect Flag, Defect Type and Originating MC.

AEMO recognises that not all legacy meter exchanges will be initiated from a 3004/3005 or a 3090/3091. Consequently, as part of the new CR Defect Flag, CR 5300/5301 would allow an MC to nullify the LMRP field. Providing an MC to remove the LMRP field and defect fields allows system flexibility if the meter exchange was not initiated from a 3004/3005 or 3090/3091.

Procedural Update

The Guide to the role of the Metering Coordinator will be updated to reflect the new requirements of an MC to update the defect flag, originating MC and defect type of the metering installation in MSATS.

4.3. RoLR

Respondents all agreed with AEMO’s overall proposal to rationalise the number of RoLR reports.

Multiple participants highlighted the need for AEMO to review and repair the clause cross references in the RoLR Procedure. AEMO has also updated the procedure to make it easier for the reader to understand which RoLR report is being referred to in a particular procedure clause, without the need to cross check against a table appended to the procedure. Please note that the Report Names included in the draft version of the Procedure may be changed prior to the publication of the final report.

Intellihub recommended that all AEMO communications that relate to RoLR events should include the Participant ID of the failed retailer, the jurisdiction in which the RoLR event applies, and the date of the RoLR event. This has been added to 5.1 of the RoLR Procedure.

Intellihub also made other recommendations for improvements to readability of the RoLR procedure which have been incorporated throughout the document.

An updated RoLR Procedure with changes marked has been included with this draft report.

4.3.1. Issue summary and submissions

In its submission to the issues paper, Intellihub recommended AEMO also removes the following reports:

Report	Description	Reason provided	Recipient
ROLR_016	Proposed Cancelled CRs - CRs Pending where SR is to become FRMP	Currently LNSPs only have visibility of CR1xxx when it is COM, therefore we believe this report is now redundant.	LNSP
ROLR_021	CRs to be accelerated (SR)	There is no obligation on the Suspended Retailer related to this report.	SR
ROLR_022	CRs to be accelerated (by LNSP)	Currently LNSPs only have visibility of CR1xxx when it is COM, therefore we believe this report is now redundant.	LNSP
ROLR_031	Proposed Cancelled CRs - CRs Pending CRs where SR is to become FRMP	Suggest this be deleted because at best this is a ‘nice to have’ report.	MDP

4.3.2. AEMO's assessment

AEMO considers that there is still value in these reports for participants and would prefer to not remove them without indication of broad industry support, in particular, from the intended recipients of these reports.

4.3.3. AEMO's conclusion

If there is agreement from industry to remove these reports (ROLR_016, ROLR_021, ROLR_022, ROLR_031) then these reports will be removed.⁴

4.4. Issue and Change Forms

4.4.1. ICF-077 Auto population of the LCCD based on NMI status

4.4.1.1 Issue summary and submissions

ICF-077 proposes that AEMO will auto-populate the LCCD field as part of the NMI update process, resulting in the following benefits:

- Reduced number of processes that retailers must manage, reduced service costs and reduced information timeframes.
- Reduced requirements of participants, reduced transactional burdens, and reduced needs for participants to routinely check the relevant information.
- Increased accuracy and compliance.

AEMO considers that auto populating the LCCD field would result in the following procedure and system changes:

B2M Procedure Changes:

- MSATS Procedures: Principles and Obligations for All Connection Points:
update to add a new obligation on AEMO to auto populate the LCCD field when a NMI is activated from Greenfield status to Active status.

MSATS System Changes:

- Auto-populate the LCCD when a NMI status changes from Greenfield to Active:
 - For series 5050/1 CRs.
 - For series 5060/1 CRs.
 - Apply the Actual Change Date (**ACD**) of the CR as the LCCD for direct transitions from Greenfield to Active.
- Streamlined Notification Process:
 - Automatically send the updated LCCD to all relevant parties entitled to a CATS Notification.

⁴ To align the changes made to Part A, changes have also been made to Part – B2B Procedures with IEC endorsement.

- Targeted Application:
 - The automation applies only to NMIs moving from Greenfield directly to Active.
- No schema change is identified.

The majority of participants supported the proposed changes for ICF-077 in the initial stage of consultation.

Changing the definition of the LCCD field:

In addition to the proposed changes for ICF-077 in the initial stage of consultation, AEMO has reviewed the current definitions in the Retail Electricity Market Procedures - Glossary and Framework, and has identified improvements to define the term, “LCCD”, more accurately. AEMO considers the amended definition to be more fulsome and places the use of the term in its correct context.

The proposed new definition for the LCCD field is as the following:

LCCD: A date where the FRMP registers a change of account holder in its systems for a NMI, which is a trigger date relevant to enabling access to data (note: the related field in the aseXML schema and MSATS database is identified as LastConsumerChangeDate).

4.4.1.2 AEMO's assessment

The majority of participants supported the proposed changes for ICF-077 in the initial stage of consultation. As a result, AEMO proposes the same changes to the B2M procedures, and MSATS system in relation to ICF-077, as per the proposal in the initial stage of consultation. In addition to those changes, AEMO proposes changing the definition of LCCD for more clarity.

4.4.1.3 AEMO's conclusion

AEMO to auto populate the LCCD field when a NMI is activated from Greenfield status to Active status as per the proposed changes to the B2M procedures and MSATS system for ICF-077. AEMO proposes to update the definition of the LCCD for more clarity.

4.4.2. ICF-078 Alignment of Addressing in B2M Procedures to AS4590.1:2017

4.4.2.1 Issue summary and submissions

ICF-078 proposes to align the address standard in B2M Procedures with the AS4590.1:2017 standard, superseding the current NEM addressing, which is based on the AS4590-1999 standard.

AEMO proposes the following changes to the B2M Procedures and aseXML Schema:

- Field Length Discrepancies - Changes in the field length of address elements within AS4590.1:2017.

NEM Addressing Field Name	Recommended B2M Procedural Change	Schema Change
	Change to the Standing Data for MSATS > Section 7.2. > Table 13: <ul style="list-style-type: none"> • Data Element Name: BuildingOrPropertyName • Description: “Defines the primary building or property name per Australian Standard AS4590.1:2017 5.8 Address site name. 	Add the MaxLength Value for AustralianBuildingOrPropertyName from 30 to 50 in ClientInformation_r4n.xsd. To adopt this change, participants must update

NEM Addressing Field Name	Recommended B2M Procedural Change	Schema Change
BuildingOrPropertyName	<p>The official place name or culturally accepted common usage name for an address site, including the name of a building, homestead, building complex agricultural property – for scenarios where the address is similar to “Rose Cottage, 9 Garden Walk, Happy Valley Retirement Village, 75 Davis Steet, NORWOOD SA 5067 Building 4A-4B Smith St”. For example, BuildingOrPropertyName = HAPPY VALLEY RETIREMENT VILLAGE BuildingOrPropertyName2 = ROSE COTTAGE”</p> <p>Change to the Standing Data for MSATS > Section 7.3. > Table 14:</p> <ul style="list-style-type: none"> • Data Element Name: BuildingOrPropertyName • Basic Example: BLAMEY RESEARCH INSTITUTE • Interval Example: HAPPY VALLEY RETIREMENT VILLAGE 	the LATEST version of the B2M schema.
BuildingOrPropertyName2	<p>ADD to the Standing Data for MSATS > Section 7.1. > Table 12:</p> <ul style="list-style-type: none"> • Data Element Name: BuildingOrPropertyName2 • Description: “Defines the secondary building or property name within a complex site as per Australian Standard AS4590.1:2017 5.6.5.4 Secondary complex (or utility) name. The name given to an entire building or area within an address site that has its own separate address - for scenarios where the address is similar to “Rose Cottage, 9 Garden Walk, Happy Valley Retirement Village, 75 Davis Steet, NORWOOD SA 5067 Building 4A-4B Smith St”. For example, BuildingOrPropertyName2 = ROSE COTTAGE, BuildingOrPropertyName = HAPPY VALLEY RETIREMENT VILLAGE” • Standing Data Required: REQUIRED • Party to Provide: LNSP <p>Add to the Standing Data for MSATS > Section 7.2. > Table 13.</p> <ul style="list-style-type: none"> • Browser Field Name: Building / Property Name2 • aseXML Data Element Name: BuildingOrPropertyName2 • aseXML Path: ElectricityStandingData/MasterData/Address/AustralianAddress/StructuredAddress/BuildingOrProperty Name2 • Browser Format: VARCHAR2(50) • aseXML Data Type: xsd:string maxLen = 50 <p>Add to the Standing Data for MSATS > Section 7.3. ></p>	Add BuildingOrPropertyName2 to the B2M AseXML Schema with similar field properties to BuildingOrPropertyName.

NEM Addressing Field Name	Recommended B2M Procedural Change	Schema Change
	<p>Table 14.</p> <ul style="list-style-type: none"> Data Element Name: BuildingOrPropertyName2 Browser Field Name: Building / Property Name2 Basic Example: BIOLOGY BUILDING B Interval Example: ROSE COTTAGE 	
FloorOrLevelType	<p>Change to the Standing Data for MSATS > Section 7.2. > Table 13:</p> <ul style="list-style-type: none"> Browser Field Name: Floor/Level Type Browser Format: VARCHAR2(2) > VARCHAR2(4) 	<p>Change the MaxLength Value for AustralianFloorOrLevelType from 2 to 4 in Enumerations.xsd. To adopt this change, Participants must update their version of Enumerations.xsd. No change to the LATEST version of either the B2M schema is required.</p>
StreetName	<p>Change to the Standing Data for > Section 7.1. > Table 12:</p> <ul style="list-style-type: none"> Data Element Name: StreetName Description: "Defines the street name per Australian Standard AS4590.1:2017 5.6.5.1 Complex road name and 5.10.1 Road name. The combination of Street Name, Street Type and Street Suffix may occur up to two times. This field may only contain letters, numbers, hyphens ('-') and spaces." <p>Change to the Standing Data for MSATS > Section 7.2. > Table 13.</p> <ul style="list-style-type: none"> Browser Field Name: Street Name Browser Format: VARCHAR2(30) > VARCHAR2(45) aseXML Data Type: xsd:string pattern: [\p{L}\p{N}\s\'}]{1,45} 	<p>Change the MaxLength Value for AustralianStreetName from 30 to 45 in ClientInformation_r4n.xsd. To adopt this change, Participants must update to the LATEST version of the B2M schema.</p>

- Enumerated Value Inconsistencies - Discrepancies in enumerated values for address elements. During the Gas consultation around the same changes to this ICF, some GRCF members have identified minor changes to the proposed abbreviations for the enumerated values for address elements. AEMO has corrected those abbreviations in the table below and have highlighted them in **yellow**.

NEM Addressing Field Name	Recommended B2M Procedural Change	Schema Change
FloorOrLevelType	No change is required.	<p>Add the following enumerations to Enumerations.xsd:</p> <ul style="list-style-type: none"> Lower Level – LL Penthouse – PTHS Platform – PLF Podium – PDM <p>To adopt this change, Participants must update their version of Enumerations.xsd. No change to the LATEST version of either the B2M schema is required.</p>
FlatOrUnitType	No change is required.	<p>Add to the comments in the schema to describe the name mapping from AS4590.1:2017 to the aseXML as described below:</p>

NEM Addressing Field Name	Recommended B2M Procedural Change	Schema Change																																
		<table border="1"> <thead> <tr> <th>Name</th> <th>AS4590.1:2017 Abbreviations</th> <th>aseXML Abbreviation</th> </tr> </thead> <tbody> <tr> <td>Duplex</td> <td>DUPL</td> <td>DUP</td> </tr> <tr> <td>Factory</td> <td>FCTY</td> <td>FY</td> </tr> <tr> <td>Flat</td> <td>FLAT</td> <td>F</td> </tr> <tr> <td>Marine Berth</td> <td>MBTH</td> <td>MB</td> </tr> <tr> <td>Office</td> <td>OFFC</td> <td>OFF</td> </tr> <tr> <td>Room</td> <td>ROOM</td> <td>RM</td> </tr> <tr> <td>Stall</td> <td>STLL</td> <td>SL</td> </tr> <tr> <td>Unit</td> <td>UNIT</td> <td>U</td> </tr> <tr> <td>Warehouse</td> <td>WHSE</td> <td>WE</td> </tr> </tbody> </table>	Name	AS4590.1:2017 Abbreviations	aseXML Abbreviation	Duplex	DUPL	DUP	Factory	FCTY	FY	Flat	FLAT	F	Marine Berth	MBTH	MB	Office	OFFC	OFF	Room	ROOM	RM	Stall	STLL	SL	Unit	UNIT	U	Warehouse	WHSE	WE		
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Unit	UNIT	U																																
Warehouse	WHSE	WE																																
StreetType	No change is required.	<p>Add the following enumeration to Enumerations.xsd:</p> <ul style="list-style-type: none"> FIRETRAIL – FTRL <p>To adopt this change, Participants must update their version of Enumerations.xsd. No change to the LATEST version of the B2M schema is required.</p> <p>ADD to the comments in the schema to describe the name mapping from AS4590.1:2017 to the aseXML as described below:</p> <table border="1"> <thead> <tr> <th>Name</th> <th>AS4590.1:2017 Abbreviations</th> <th>aseXML Abbreviation</th> </tr> </thead> <tbody> <tr> <td>AVENUE</td> <td>AV</td> <td>AVE</td> </tr> <tr> <td>CRESCENT</td> <td>CR</td> <td>CRES</td> </tr> <tr> <td>GLADE</td> <td>GLDE</td> <td>GLD</td> </tr> <tr> <td>PARKWAY</td> <td>PWY</td> <td>PKWY</td> </tr> </tbody> </table>			Name	AS4590.1:2017 Abbreviations	aseXML Abbreviation	AVENUE	AV	AVE	CRESCENT	CR	CRES	GLADE	GLDE	GLD	PARKWAY	PWY	PKWY															
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The majority of participants supported the proposed changes for ICF-078 in the initial stage of consultation.

4.4.2.2 AEMO's assessment

The majority of participants supported the proposed changes for ICF-078 in the initial stage of consultation. As a result, AEMO proposes the same changes with minor corrections to some of the proposed abbreviations for the enumerated values for address elements, to the B2M procedures and the schema in the draft determination stage.

4.4.2.3 AEMO's conclusion

AEMO retains its position on the proposed changes to the B2M Procedures and the aseXML schema to align addressing to the AS4590.1:2017. The alignment at this stage is to fix the following types of discrepancies:

- Field Length Discrepancies - Changes in the field length of address elements within AS4590.1:2017.
- Enumerated Value Inconsistencies - Discrepancies in enumerated values for address elements.

4.4.3. ICF-079 NEM 12 MDFF Inconsistencies

4.4.3.1 Issue summary and submissions

The MDFF Specification NEM 12 has an inconsistent obligation relating to the provision of 400 block data for actual reads. Specifically, AEMO has identified the inconsistency between clauses 4.4 and 4.5 of the MDFF Specification.

This inconsistency has led to different interpretations amongst participants as to how a NEM 12 should be formatted. Consequently, some parties have data rejected, requiring them to make software changes in their systems to accommodate the alternate interpretations of the MDFF.

Accordingly, ICF-079 proposes to remove the inconsistency between clauses 4.4 and 4.5 of the MDFF Specification.

The proposed changes to the MDFF Specification can be found in the attached draft change marked version 2.6 of the document MDFF Specification.

Many participants supported the proposed changes for ICF-079 in the initial stage of consultation. However, some participants suggested that the proposed wording to remove the inconsistency between clauses 4.4 and 4.5 of the MDFF Specification needs more clarification as the following:

- CitiPower Powercor and United Energy suggested the proposed changes still provide ambiguity and seeks clarification and recommended wording amendment under section 4.5 of the MDFF Specification.
- TasNetworks acknowledged that the proposed changes should remove any interpretation discrepancy and noted that some words are superfluous and are not required.

4.4.3.2 AEMO's assessment

As per CitiPower Powercor, United Energy, and TasNetwork's recommendations, AEMO has revised the definition of QualityMethod in the table under section 4.5 of the MDFF Specification, and the example of 400 record where quality flag = A and ReasonCode is 61, 79 or 89. AEMO has removed the superfluous wording.

4.4.3.3 AEMO's conclusion

AEMO has revised the proposed wording in the initial stage of consultation to sections 4.4 and 4.5 of the MDFF Specifications. AEMO has removed the superfluous wording.

The proposed changes to the MDFF Specification can be found in the attached draft change marked version 2.6 of the document MDFF Specification.

4.5. Embedded Network Settlement Anomalies

4.5.1. Issue summary and submissions

AEMO has identified the opportunity for an SGA connection within an embedded network to gain value from what AEMO considers to be an unintended application of retrospective NMI activation and deactivation in the settlement process. This can occur sometime after the "trading week" once prices and energy flow volumes are known, utilising processes designed to support error corrections. This is at odds with all other persons' participation in the 'live' spot market. In simple terms, market participants associated with SGA connections within embedded networks can decide whether to sell their energy

“gross” into the spot market or use it to offset the customer’s load after spot prices have been observed and energy volumes are known, including up to the second revision in the settlement process (i.e. up to 30 weeks following the settlement week).

In the Issues Paper, AEMO proposed that this could be resolved by limiting the ability for NMIs in embedded networks to be activated or deactivated retrospectively and removing the ability of an MDP to activate and deactivate datastreams in embedded networks retrospectively.

Responses to the proposal were broadly against the concept and identified the following issues:

- Impacts to business-as-usual operations across the entire embedded network function because business logic is predicated on retrospective change requests.
- Removing retrospectivity may cause billing issues.
- Removing retrospectivity does not allow for data error corrections.

Due to the responses, AEMO met separately with Intellihub, PlusES, and Origin to discuss the concerns more fully. AEMO chose these participants as a cross-section impacted by the proposed changes, and who provided a more detailed response to the questions posed by AEMO in the Issues Paper.

At these sessions, participants acknowledged the issue AEMO proposes stopping, retrospective NMI activation and deactivation in the settlement process. They reiterated the issues raised in responses to the Issues Paper and sought to determine whether AEMO could apply system logic to remove the ability of Small Resource Aggregators to retrospectively activate and deactivate NMIs and data streams in embedded networks.

4.5.2. AEMO's assessment

AEMO has considered the responses in the Issues Paper as well as the one-on-one discussions with Intellihub, PlusES, and Origin. AEMO acknowledges that the proposal outlined in the Issues Paper has broader implications for businesses working in the embedded network market. AEMO assessed removing retrospectivity for Small Resource Aggregators in embedded networks and discovered it was not technically feasible.

4.5.3. AEMO's conclusion

AEMO will maintain NMI creation and associated metering and data stream creation for embedded networks. However, AEMO proposes to remove the ability of the MDP to retrospectively change datastreams on an existing embedded network child meter. A new change request will be created that allows the MDP to prospectively populate the datastream to active or inactive. The changes are to:

- Update the 4050/4051 – Change NMI datastream details change request to exclude Child NMIs
- Create a new 4060 – Change NMI datastream details - Child change request for Child NMIs

4.6. Other Matters – B2B Change to Glossary and Framework

4.6.1. Issue summary and submissions

The ASMD rule introduces a *shared fusing meter replacement procedure*, designed to coordinate the outage requirements for metering installations on a shared fuse that must be repaired, replaced or installed. The procedure impacts metering parties, retailers and distribution network service providers.

The B2B Working Group requested the following new B2B Procedure terms and definitions as a consequence of the shared fusing metering replacement procedure.

Term	Definition
Coordinated Interruption ID	For the purpose of the Shared Fusing Meter Replacement Procedure, consists of the DNSP Job Number and Version ID, and separated by the tilde (~) symbol. For example: if the DNSP’s Job Number is TS123 and this is the original scheduled job then the Coordinated Interruption ID should be TS123~1. If this job had to be rescheduled then the Coordinated Interruption ID should be TS123~2
DNSP Job Number	For the purpose of the Shared Fusing Meter Replacement Procedure, the unique DNSP Job Number. The maximum length of the DNSP Job Number is 15 characters and can be alphanumeric.
First Affected NMI	For the purpose of the Shared Fusing Meter Replacement Procedure, the NMI nominated on the Temporary Isolation-Scoping Request service order
NMIs Impacted	For the purpose of the Shared Fusing Meter Replacement Procedure, the First Affected NMI (could be interval or legacy meter) in addition to all other NMIs containing a legacy meter that are impacted by the planned outage and where metering work is expected to occur. The allowable values are numbers between 1 and 99 and must be padded with a leading zero. For example: A COMMS4 meter requires replacement and is the First Affected NMI. There are no additional NMIs with legacy meters impacted by the planned outage, then the NMIs Impacted should be ‘01’ A NMI containing legacy meters requires replacement and is the First Affected NMI. There are 3 additional NMIs with legacy meters, and two NMIs with non-legacy meters impacted by the planned outage, then the NMIs Impacted should be ‘04’
OIAI Duration	For the purpose of the Shared Fusing Meter Replacement Procedure, the duration of the distributor planned interruption as provided by the DNSP in the MFIN, expressed as HH:MM
Original MC	The participant ID of the MC who initially identified the shared fuse and initiated the shared fusing meter replacement procedure
Version ID	For the purpose of the Shared Fusing Meter Replacement Procedure, indicates the job version and provides visibility of when a reschedule has occurred. Must start with ‘1’ when communicating the original scheduled job. The allowable values are numbers between 1 and 9.

4.6.2. AEMO’s assessment

The proposal to include new definitions to the Retail Electricity Market Procedures – Glossary and Framework, is an outcome from the B2B consultation to facilitate the shared fusing metering replacement procedure. The Retail Electricity Market Procedures – Glossary and Framework allows for terms and references that refer to:

- B2B Procedures only.
- Terms and definitions which occur in the B2B Procedures and one or more Retail Electricity Market Procedures.

4.6.3. AEMO's conclusion

AEMO proposes to include the new definitions as B2B Procedure only terms and definitions into the Retail Electricity Market Procedures – Glossary and Framework.

5. Draft determination on proposal

Matters associated with the LMRP field

- Define Legacy Meter Replacement as ‘the last day by which a meter scheduled for an approved LMRP is to be replaced’.
- Format LMRP field to: DD/MM/YYYY
- Require a DNSP, affected by the ASMD rule, to use the Blind Update Tool to populate the LMRP field from 26 October 2025 to 27 November 2025
- AEMO to coordinate the data load of LMRP 26 October 2025 to 27 November 2025.
- Modify the existing CR 5050/5051 to allow a DNSP to make a retrospective or prospective change to populate the LMRP field to be effective from 1 December 2025
- Allow the MC to null the LMRP field for the new CR5300/5301
- Create the following SDQ reports:
 - (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect
 - (2) 'BASIC' or 'MRIM' sites without an LMRP date
 - (3) Not ('BASIC' or 'MRIM') meters with an LMRP date

Defect Management

- Include a new attribute of ‘Originating MC’; visible to the current FRMP only.
- AEMO to Nullify the defect information of Defect Flag, Originating MC and Defect Type when a legacy meter is replaced with a COMMS meter for a CR 3004/3005 and 3090/3091.
- Allow the MC to populate the new attributes of defect flag, originating MC and defect type for new CR 5300/5301
- Allow the MC to null the defect flag, originating MC and defect type for new CR 5300/5301.
- Create an enumerated list of defect types to be populated by the MC to be enforced by MSATS.

ROLR

- Remove 13 RoLR reports.
- Update the RoLR Procedure Part A to correct cross references and to improve overall readability of the procedure.
- Remove references to use of password protected emails to deliver RoLR reports to allow delivery of reports to be aligned with other MSATS reports.

Issues and Change Forms

- **ICF-077 Auto population of the LCCD based on NMI status.**

AEMO to auto populate the LCCD field when a NMI is activated from Greenfield status to Active status.
- **ICF-078 Alignment of Addressing in B2M Procedures to AS4590.1:2017**

Align the address standard in B2M Procedures with the AS4590.1:2017 standard, superseding the current NEM addressing, which is based on the AS4590-1999 standard. The alignment at this stage is to fix the following types of discrepancies:

 - Field Length Discrepancies - Changes in the field length of address elements within AS4590.1:2017.

- Enumerated Value Inconsistencies - Discrepancies in enumerated values for address elements.
- **ICF-079 NEM 12 MDFF Inconsistencies**
Remove the inconsistency between clauses 4.4 and 4.5 of the Meter Data File Format Specification NEM12 & NEM13 (**MDFF Specification**) relating to the provision of 400 block data for actual reads.

Embedded Network Settlement Anomalies

- Update the CR4050/4051 – Change NMI datastream details change request to exclude Child NMIs
- Create a new CR4060 – Change NMI datastream details - Child change request for Child NMIs

Other Matters – B2B Change to Glossary and Framework

Include the following terms: Coordinated Interruption ID, DNSP Job Number, First Affected NMI, NMIs Impacted, OIAI Definition, Original MC and Version ID as B2B Procedure only terms in the Retail Electricity Market Procedures – Glossary and Framework.

Effective date

To align with ASMD Rule, AEMO proposes to amend the Procedures and documents with the following effective dates:

26 October 2025

- MSATS Procedure – Principles and Obligations for All Connection Points v7
- Standing Data for MSATS v6

1 December 2025

- MSATS Procedure – Principles and Obligations for All Connection Points v7.1
- Standing Data for MSATS v6.1
- Guide to the Role of the Metering Coordinator (MC) v2.0
- MDFF Specification NEM12 NEM13 v2.7
- NEM RoLR Process Part A – MSATS Procedure: RoLR Procedures Part B – B2B Procedure
- Retail Electricity Market Procedures – Glossary and Framework v4.4

5.1. Consultation Questions

Questions

1. Do you agree with the proposed changes to the Procedures to reflect the requirements of the Accelerating Smart Meter Deployment Rule related the LMRP and Defects? If not, please explain the specific draft decision you do not agree with and any proposed alternative solution.
2. Do you agree with the proposed approach to RoLR? If not, please provide any proposed alternative solution.
3. Do you agree with the proposed changes for ICF-077 Auto population of the LCCD based on NMI status?
4. Do you agree with the proposed changes for ICF-078 Alignment of Addressing in B2M Procedures to AS4590.1:2017?
5. Do you agree with the proposed changes for ICF-079 NEM 12 MDFF Inconsistencies?
6. Do you agree with AEMO's decision to update CR CR4050/4051 to exclude Child NMIs and create a new change request for embedded networks only? If not, please explain your reason and any proposed alternative solution.
7. Do you agree with the proposed changes to the Glossary and Framework to include new B2B Procedure terms for the shared fusing meter replacement procedure.

Stakeholders are requested to respond to the proposed draft changes in the changed marked versions of the different procedures and guidelines.

Appendix A. Glossary

Term or acronym	Meaning
AS4590	Australian standard for interchange of client information
ASMD	Accelerated Smart Meter Deployment
B2B	Business-to-business
B2M	Business-to-market
BUT	Blind Update Tool
CATS	Consumer Administration and Transfer Solution, a part of MSATS.
C1	Data Replication Resynchronisation Report
C4	NMI Master Report
C7	New Participant Data Access Report
CP	Connection Point
CR	Change request
DNSP	Distribution network service provider
ERCF	Electricity Retail Consultative Forum
FRMP	Financially Responsible Market Participant
ICF	Issue / Change Form
LCCD	Last Consumer Change Date
LNSP	Local Network Service Provider
MDFP	Meter Data File Format
MDP	Meter Data Provider
MC	Metering Coordinator
MSATS	Market Settlements and Transfer Solution
MSR	Metering Services Review
NEM	National Electricity Market
NEM12	The file format for interval metering data
NEM13	The file format for accumulated metering data
NEL	National Electricity Law
NER	The National Electricity Rules made under Part 7 of the National Electricity Law
NMI	National Metering Identifier
RoLR	Retailer of Last Resort

Appendix B. List of Submissions and AEMO Responses

5.1.1. Matters associated with LMRP and Defect Management

No.	Heading	Participant	Participant Comments	AEMO response
1	What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	AGL	AGL's preferred format is YYYY, but specifically wants to flag that this field should be structured as a DATE format field. The expectation is that the information provided as YYYY (e.g. 2025) would relate to a financial year, most likely the period the meter is due to be replaced (e.g. a meter in the 2025/2026 year would be represented as 2026). AGL notes that the usage of this field needs to be consistent. AGL is also aware that some Networks are interested in providing a greater level of granularity, and AGL believes that using the date format will allow for that granularity.	AEMO notes AGL's preference, however AEMO proposes a DD-MMM-YYYY field, with a standard definition in the Procedures describing the date the legacy meter must be replaced by.
1	What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Origin Energy	Origin supports the format of DD-MMM-YYYY with a clear definition that the date is the 'LMRP due date' as per LMRP schedule. For avoidance of doubt, field name should be self-explanatory, i.e., LMRP due date	AEMO notes Origin Energy's response and request for the field to be self-explanatory.
1	What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Bluecurrent	YYYY. In regards to including a quarterly indicator - It is unlikely that a Metering provider will be able to construct a program that will meet the quarter requirement because resource availability will vary between metering providers and this will be the primary driver for the timing of meter exchanges over the year, and other factors. Also the rule does not support DNSP's directing a retailer to perform a meter exchange in a specific quarter therefore specify a quarter is unnecessary.	AEMO notes Bluecurrent's response, however AEMO proposes a DD-MMM-YYYY field, with a standard definition in the Procedures describing the date the legacy meter must be replaced by.
1	What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	SA Power Networks	SAPN sees YYYY would be the preferred format, while at the same time is also open to the DD-MMM-YYYY format if there is enough support and justification. However, we do not support the Q#-YYYY option.	AEMO notes SAPN's response.
1	YYYY or DD-MMM-YYYY) to meet the requirement of	Evoenergy	Why have YYYY? Just have 1, 2, 3, 4, 5 to closer reflect the 'Interim period' in the determination.	AEMO notes Evoenergy's response. AEMO proposes to stipulate in the CATS Procedure a

No.	Heading	Participant	Participant Comments	AEMO response
	the ASMD Draft Rule for the LNSP?		<p>If the proposed date agreed is YYYY, must stipulate that this means financial year start.</p> <p>If the proposed date agreed is Q#-YYYY, must stipulate that this means calendar year Q1 etc. Not preferred.</p> <p>If the proposed date agreed is DD-MMM-YYYY, must stipulate that this defines the period the MC can schedule works from date, and must be first day of that month. Otherwise risk of getting too many variations.</p> <p>Preferred option: DD-MMM-YYYY or 1,2,3,4,5. Either way, needs qualifying statements.</p>	date field of DD-MMM-YYYY describes the last day a legacy meter must be replaced by.
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Endeavour Energy	Preferred format: Q#-YYYY	AEMO notes Endeavour Energy's response, however AEMO proposes a DD-MMM-YYYY field, with a standard definition in the Procedures describing the date the legacy meter must be replaced by. Majority feedback from participants has not supported a Q field.
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Ausgrid	<p>Ausgrid's strong preference is either of these Q#-YYYY or DD-MMM-YYYY.</p> <p>Ausgrid strongly urges AEMO to allow participants flexibility in the population of the LMRP field. This is critical for the successful scheduling of multi occupancy one in all in works and overall meter reading route efficiency. Ausgrid is currently negotiating with a number of participants around identification of flexible LMRP dates within each LMRP year.</p> <p>Once a format is decided a standard arrangement must be agreed between all LNSPs. Is it the start or the finish of the LMRP year (i.e. 01072025 or 30062026).</p> <p>Ausgrid does not support YYYY.</p>	AEMO notes Ausgrid's response, however AEMO proposes a DD-MMM-YYYY field, with a standard definition in the Procedures describing the date the legacy meter must be replaced by. Majority feedback from participants has not supported a Q field.
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	EnergyAustralia	DD-MMM-YYYY	AEMO notes EnergyAustralia's response.
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Intellihub	<p>We prefer the format of Q#-YYYY as this will allow the DNSP to suggest which NMI to work on for each quarter (noting that this is a suggestion only).</p> <p>We also support the format of YYYY as this is the minimum information required from the DNSP.</p>	AEMO notes Intellihub's response, however AEMO proposes a DD-MMM-YYYY field, with a standard definition in the Procedures describing the date the legacy meter must be replaced by.

No.	Heading	Participant	Participant Comments	AEMO response
			We do not support DD-MMM-YYYY because this may be setting expectations that a meter exchange is to occur on a particular date, or a date period that is shorter than a quarterly period, which we are unlikely be able to comply with.	
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors	N/A
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors	N/A
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Energy Queensland	Energy Queensland's preferred format is YYYY. It is our view that this is the simplest format and could most easily be incorporated into administrative processes.	AEMO notes EQL's preference, however AEMO proposes a DD-MMM-YYYY field, with a standard definition in the Procedures describing the date the legacy meter must be replaced by.
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	PlusES	PLUS ES' preference is that a formatting consistency exists across B2M and B2B fields. Generally, formatting of 'date' fields is dd/mm/yyyy and subsequently participants may have aligned their own system 'date' formatting to the standard. Consequently, PLUS ES's preference is dd/mm/yyyy. Additionally, the LMRP field value should have a standard definition. We recommend 'Legacy meter replacement must be completed by this date'. For example, if the LNSP schedules a NMI for the FY1 of the LMRP year, assuming the LMRP commences 1 Jul 25, then the LMRP field value should be 30/06/2026.	AEMO notes PlusES's response.
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Red & Lumo	Red Energy and Lumo Energy (Red and Lumo) prefer the date format DD-MMM-YYYY, with the DD-MMM indicating the last day of the quarter/financial year. e.g. 30-JUN-2027	AEMO notes Red Energy and Lumo's response. AEMO proposes to stipulate in the CATS Procedure a date field of DD-MMM-YYYY describes the last day a legacy meter must be replaced by.
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	TasNetworks	The draft rule includes a definition of Interim Period (being each financial year within the LMRP Period). Accordingly, TasNetworks believes the format of the field for the LMRP only needs to indicate the interim period by way of a single digit (e.g. 1, 2, 3 etc.). Having a value of YYYY may cause confusion and require two-year groups to be aggregated for reporting against an interim period. If a day and	AEMO notes TasNetworks response. AEMO proposes to stipulate in the CATS Procedure a date field of DD-MMM-YYYY describes the last day a legacy meter must be replaced by.

No.	Heading	Participant	Participant Comments	AEMO response
			<p>month is included, it is not clear whether it is intended to signify the start of an interim period or the end of the period.</p> <p>TasNetworks understands that some DNSPs have a preference to be able to define interim periods in a more granular form of quarterly periods. TasNetworks is also accepting of this approach, but this approach would need to also allow for a quarterly period not being specified (e.g. set the Q value to 0).</p> <p>TasNetworks has no preferred format and can cater for whatever is introduced for setting this value in MSATS via the BUT, as long as there is flexibility to assign NMIs to an individual yearly interim period.</p>	
1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Alinta	<p>The preference would be YYYY, subject to confirmation of this is calendar year and any data loaded in a partial calendar year as a result of go-live date, provides data for the following year.</p> <p>For example, a go-live 01-JUL-2025 would not have any dates as 2025, only 2026.</p>	AEMO notes Alinta's response. AEMO proposes to stipulate in the CATS Procedure a date field of DD-MMM-YYYY describes the last day a legacy meter must be replaced by.
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	AGL	Both tools are suitable, however AGL recommends the use of the BUT in the first instance to avoid a high volume of market transactions. However, if an LMRP year post the initial value being set is changed, the LNSP should be required to notify appropriate participants. If a small number of updates were required, CRs would be appropriate.	AEMO notes AGL's response and has proposed a similar approach outlined in the draft determination.
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Origin Energy	Origin supports the use of BUT tool for initial LMRP data population in MSATS, followed by CRs for any subsequent change in that field to ensure the CATS history model is maintained.	AEMO notes Origin's response and has proposed this in the draft determination.
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Bluecurrent	We support Bulk Update Tool as the primary method of updating MSATS. We don't think that capability to update the LMRP year via CR's is required if DNSP's load the LMRP indicator via the BUT tool at the start of the program. It's a one-off task.	AEMO has proposed both Bulk Update Tool and CRs to update the LMRP field
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	SA Power Networks	SAPN sees the proposed tools are adequate.	AEMO has proposed both Bulk Update Tool and CRs to update the LMRP field
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Evoenergy	Yes	AEMO has proposed both Bulk Update Tool and CRs to update the LMRP field

No.	Heading	Participant	Participant Comments	AEMO response
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Endeavour Energy	Yes, the proposed tools are adequate to update the LMRP field.	AEMO has proposed both Bulk Update Tool and CRs to update the LMRP field
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Ausgrid	Ausgrid supports the use of the BUT for initial load and CRs for any updates.	AEMO has proposed both Bulk Update Tool and CRs to update the LMRP field
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	EnergyAustralia	Yes	AEMO has proposed both Bulk Update Tool and CRs to update the LMRP field
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Intellihub	We support using the BUT to update the LMRP field in MSATS but do not support CRs for updating this field because it creates a risk that changes via CR can be done outside of the AER approval process which means that our plans may be impacted with short notice. We understand that any changes to an approved LMRP can only be done if there is a material error or material change event, which suggest that the change must be for a large volume of NMIs therefore using the BUT would be most appropriate.	AEMO notes Intellihub's response, however based on industry feedback the proposal and the notification of CRs to the market, AEMO is proposing the use of a CR to update the LMRP field.
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors	N/A
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors	N/A
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Energy Queensland	Energy Queensland is of the view that the use of the Blind Update Tool (BUT) is adequate to update the Legacy Meter Retirement Plan (LMRP) field.	N/A
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	PlusES	The proposed tools BUT and CRs is adequate to update the LMRP field. PLUS ES proposes that the utilisation of the BUT is limited to the initial population of the LMRP field. Post go live if any LMRP values need to be changed, PLUS ES recommends that a CR is used so that all associated participants receive the notification and update their systems accordingly. The BUT does not provide notifications and a participant who has downloaded the LMRP value prior to any change will be unaware of any changes.	AEMO notes PlueES's response and has proposed this in the draft determination.

No.	Heading	Participant	Participant Comments	AEMO response
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Red & Lumo	Red & Lumo agree that the BUT for initial load and CR for any updates are appropriate methods for populating the LMRP field.	AEMO notes Red/Lumo's response and has proposed this in the draft determination.
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	TasNetworks	TasNetworks supports the use of the BUT for populating the LMRP field in MSATS. TasNetworks does not believe there is a case for CRs to be developed for this purpose. If the LMRP field needs to be updated then it is likely that this would need to be done for groups of NMLs not on an individual basis, and therefore the BUT should be configured to facilitate this in all cases	AEMO notes Tasnetwork's response, however based on industry feedback the proposal and the notification of CRs to the market, AEMO is proposing the use of a CR to update the LMRP field.
2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Alinta		N/A
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	AGL	AGL recommends AEMO coordination, particularly if the BUT is used given the volume limits in place. This will also allow for a clear schedule for LNSP's to avoid any crossover.	AEMO notes AGL's response and has proposed this in the draft determination
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Origin Energy	Yes, Origin supports AEMO's coordination in managing LMRP data population in MSATS, similar to the MSDR project as it worked seamlessly across all participants.	AEMO notes Origin's response and has proposed this in the draft determination
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Bluecurrent	No comment – not impacted.	N/A
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	SA Power Networks	SAPN sees minimal support and coordination will be required from AEMO to ensure there should be no surprise in both the volume and schedule for performing the update.	AEMO notes SAPN's response but has proposed to include coordination on the basis of industry feedback
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from	Evoenergy	Preferred. Do not want to slow or impede MSATS operability and speed. Keep it simple.	AEMO notes Evoenergy's response and has proposed this in the draft determination

No.	Heading	Participant	Participant Comments	AEMO response
	May 2025 to 29 June 2025?			
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Endeavour Energy	No, AEMO coordination is not required for us to load LMRP into MSATS from May 2025 to 29 June 2025.	AEMO notes INTEGP's response but has proposed to include coordination on the basis of industry feedback
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Ausgrid	AEMO should consult with industry and allow for LNSP to schedule updates using the BUT.	AEMO notes Ausgrid's response and has proposed this in the draft determination
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	EnergyAustralia	Yes	AEMO notes EA's response
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Intellihub	Yes, we believe AEMO should help to coordinate the updating of the LMRP field in MSATS to manage the large volume of updates so it is done in the shortest time without impacting on system performances.	AEMO notes EA's response
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors	N/A
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors	N/A
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Energy Queensland	Energy Queensland is of the view that AEMO coordination is required for DNSPs to load LMRP into Market Settlement and Transfer Solutions (MSATS) from May 2025 to 29 June 2025 to ensure identified update limits are effectively applied and managed (for example, where a MSATS limit of 400k National Metering Identifiers (NMIs) per day is applied).	AEMO notes Energy Queensland's response and has proposed this in the draft determination

No.	Heading	Participant	Participant Comments	AEMO response
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	PlusES	To minimise participant impact it would be beneficial for AEMO to provide high-level coordination regarding the upload of the LMRP fields. Furthermore, the NMIs for the first LMRP target year should be updated by LNSPs ASAP and all LMRP NMIs should be updated before the commencement of the Acceleration Smart Meter Deployment.	AEMO notes PlusES's response
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Red & Lumo	Red and Lumo leave this to DNSP to respond to.	AEMO notes Red/Lumo's response but has proposed to include coordination on the basis of industry feedback
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	TasNetworks	It would be preferable for AEMO to coordinate an allotted schedule for each DNSP to utilise the BUT for the initial population, to alleviate congestion and transaction volumes for those participants utilising C1 report replication.	AEMO notes TasNetworks response
3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Alinta		N/A
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	AGL	Standing Data quality reports will prove useful; however, we believe that providing more detail on what should be included in these reports would need to be determined once the rule change has been finalised, and all parties are clear on what their obligations are. Some possible standing reports could cover: <ul style="list-style-type: none"> NMIs due in a financial year NMIs with Defects NMIs with only the initial MC/MP NMIs without defects where the LMRP has been passed NMIs with First Notice issued NMIs where customer has advised rectification / remediation 	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date"
4	Are standing data quality reports required to be created for participants to	Origin Energy	Origin recommends new SQ reports to be developed and sent to the current FRMPs every week as an RM-xx individual results and summary report.	AEMO has proposed the following reports to industry consideration:

No.	Heading	Participant	Participant Comments	AEMO response
	meet their procedural obligations for LMRP? If so, what are the components of these reports?		<ul style="list-style-type: none"> The key components of this RM report should be based on the new standing data fields that are being created as a consequence of ASMD rule change, including (not limited to) NMIs in current LMRP year for a particular FRMP, NMIs that are overdue NMIs with defect flag, and NMIs with different Site Remediation Statuses and Dates. Second RM report should provide any missing values in Site Remediation Status and Dates where defect has been flagged. Origin suggests another report be created and issued to the new/current FRMPs end of each month with NMIs that have LMRP year as the 'current year' where a FRMP has changed due to an in-situ or move-in transfer. 	<p>(1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect</p> <p>(2) 'BASIC' or 'MRIM' sites without an LMRP date</p> <p>(3) Not ('BASIC' or 'MRIM') meters with an LMRP date"</p>
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Bluecurrent	No comment – not impacted.	N/A
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	SA Power Networks	SAPN sees there would be value to run the snapshot report only for the type 5&6 NMIs. This will help ensuring all the NMIs require to be included in the LMRP and the BUT process are correctly captured.	<p>AEMO has proposed the following reports to industry consideration:</p> <p>(1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect</p> <p>(2) 'BASIC' or 'MRIM' sites without an LMRP date</p> <p>(3) Not ('BASIC' or 'MRIM') meters with an LMRP date"</p>
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Evoenergy	<p>Generally No, as participants understand their obligations and already report to AER.</p> <p>May want a report on 1 July 2025 where no LMRP entered.</p>	<p>AEMO has proposed the following reports to industry consideration:</p> <p>(1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect</p> <p>(2) 'BASIC' or 'MRIM' sites without an LMRP date</p> <p>(3) Not ('BASIC' or 'MRIM') meters with an LMRP date"</p>
4	Are standing data quality reports required to be created for participants to	Endeavour Energy	<p>Yes, a report would ensure that obligations are met.</p> <p>The components of the report are to include:</p>	<p>AEMO has proposed the following reports to industry consideration:</p>

No.	Heading	Participant	Participant Comments	AEMO response
	meet their procedural obligations for LMRP? If so, what are the components of these reports?		- NMI	(1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date"
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Ausgrid	AEMO should provide reports to LNSPs where a Type 5/6 NMI does not have an appropriate LMRP date populated.	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date"
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	EnergyAustralia	The report required needs to contain the NMI; LMRP date; Defect type; site remediation status;	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date"
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Intellihub	Yes, reports should be created to identify NMIs with a type 5/6 meter without the LMRP field populated	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date"
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors	N/A

No.	Heading	Participant	Participant Comments	AEMO response
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors	N/A
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Energy Queensland	Energy Queensland is of the view that no specific standing data quality reports (SDQR) are required to be created for participants to meet their procedural obligations for LMRP. However, if SDQR were to be required, we see value in it being made available for all participants and to incorporate components such as: <ul style="list-style-type: none"> • completion reporting against LMRP year targets; and • defect management reporting, including notice dates and type of notification. 	AEMO has proposed the following reports to industry consideration: <ol style="list-style-type: none"> (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date”
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	PlusES	For a large deployment program such as LMRP, PLUS ES supports that standing data quality reports would deliver benefits. Some SDQ proposals: <ul style="list-style-type: none"> • NMIs with Basic/MRIM and no assigned LMRP value to the LNSP • No Contestable MC assigned to a LMRP NMI within 3 months of the LMRP date - sent to the FRMP. • LMRP NMI where the LMRP date has lapsed, and a legacy meter exists. i.e. No COMMSX meter installed. This report could also include if a defect has been identified against the NMI. To the FRMP & MC. 	AEMO has proposed the following reports to industry consideration: <ol style="list-style-type: none"> (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date”
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Red & Lumo	Red and Lumo do not require ongoing standing data reports to identify LMRP in standing data.	AEMO has proposed the following reports to industry consideration: <ol style="list-style-type: none"> (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date”
4	Are standing data quality reports required to be created for participants to	TasNetworks	From a DNSP perspective it may be preferable that AEMO verify that 100 per cent of NMIs with legacy meters have been populated with an LMRP value in MSATS. This could be a once-off report for the	AEMO has proposed the following reports to industry consideration:

No.	Heading	Participant	Participant Comments	AEMO response
	meet their procedural obligations for LMRP? If so, what are the components of these reports?		initial load and then considered as an ongoing SDQ report if deemed necessary.	(1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date"
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Alinta		N/A
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	AGL	Currently, no.	N/A
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Origin Energy	No further comments	N/A
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Bluecurrent	No comment.	N/A
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	SA Power Networks	No comment.	N/A

No.	Heading	Participant	Participant Comments	AEMO response
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Evoenergy	LMRP MSATS field. YYYY is not preferred. Just have 1, 2, 3, 4, 5 to closer reflect the interim period in the determination, or DD-MMM-YYYY with qualifying statement.	AEMO has proposed a DD-MMM-YYYY with a qualifying statement.
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Endeavour Energy		N/A
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Ausgrid	Why are greenfield sites included in LMRP assessment? A NMI should not be in MSATS without a meter installed. LMRP date should not be nulled after the legacy meter is replaced for reporting purposes. Individual CSV files will not be provided once the LMRP date has been populated in MSATS.	AEMO thanks Ausgrid for the response. AEMO has identified NMIs with a NMI status code of Greenfield with the Meter Status code of Removed. AEMO will request DNSPs to confirm the NMI status code should be made X. As part of industry engagement, nullifying the LMRP field after replacement of a legacy meter has been discussed. The SDQ reports will allow industry to report on legacy meter replacements.
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	EnergyAustralia	Unlike VIC, this smart meter rollout is landed on the retailer, from communication, appointments, customer service, issues management, complaint management and potential bad debt where customers can't pay accounts or for site upgrades. There is not a standard approach to either customer communication or financial support for customers to upgrade sites. We will be impacted by all of this as well as the 'One in All in' proposed solution. The responsibility should be shared between the DB's and the retailers especially on the Shared fuse process. We dismissed looking at the most efficient way to manage these replacements – there is no standard or requirement for anyone other than the retailer to manage this.	AEMO notes the response.
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Intellihub	We note AEMO is proposing a release date that tries to balance the maximum time allowed for industry to design, build and test their solution and the time required for updating the LMRP field in MSATS. We agree with this approach and suggest AEMO share with industry how they determined the optimal release date (we believe with the information available in MSATS AEMO has all the required information to make this determination). It is our understanding that	AEMO will provide further detail of the release timing in the final HLIA for MSR.

No.	Heading	Participant	Participant Comments	AEMO response
			the LMRP updates can be done within 10 business days, however it would be good to get AEMO's confirmation.	
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors	N/A
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors	N/A
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Energy Queensland	Energy Queensland does not have any feedback on this consultation question.	N/A
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	PlusES	PLUS ES do not support communication of LMRP dates or updates of specific NMs via CSV files. The CSV file is out of date the minute it is sent.	AEMO notes the response.
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Red & Lumo	Red and Lumo reserve the right to offer alternative suggestions once the Final Determination is made.	AEMO notes the response.
5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	TasNetworks	No comment.	N/A

No.	Heading	Participant	Participant Comments	AEMO response
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	AGL	<p>AGL prefers the defect type to be included in MSATS rather than just a flag, to identify customer side defects. However, noting the current position of AEMO and no clarity from the AEMC, AGL supports a flag.</p> <p>Note:</p> <p>AGL has also provided feedback in Question 5 which also outlines that ownership of the Defect Flag should be the responsibility of the MP/MC as they have the most information on the defect on a site and should retain management of that Flag to ensure it is maintained with respect to the status of the site and only updated when the meter is replaced.</p>	AEMO has included defect type as part of this draft determination.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS? Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Origin Energy	<p>Origin supports the defect flag to be updated and maintained by the current MC in MSATS.</p> <p>While Origin understands that AEMO has removed the 'Defect Type' from this issues paper, Origin strongly supports the defect 'information' to be also stored in MSATS for operational efficiencies. This may be subject to the clarification provided in the AEMC's final rule; however the site defect information can be stored in MSATS in a way that does not overlap with any customer specific information. For e.g. 'obstruction' may be customer specific, however 'asbestos board' is site specific that may have no correlation with customer data.</p>	AEMO has included defect type as part of this draft determination.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Bluecurrent	We believe the defect flag should represent the nature-of-defect rather than a yes/no flag as is proposed. This provides the most efficient mechanism to provide this information to a retailer to allow them to meet their notification obligations. The nature-of-defect codes that are required to be included are specified in the B2B V3.9 consultation.	AEMO has included defect type as part of this draft determination.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	SA Power Networks	SAPN sees allowing the MC to record the Nature-of-defect information in MSATS instead of only the Defect flag can avoid having the need to have separate B2B transactions for exchange of the information. This can help streamline the process and better data consistency as comparing to the approach of allowing MC to record a defect with only the Defect flag in MSATS and then need to have a separate B2B transactions for the exchange the Nature-of-defect information.	AEMO has included defect type as part of this draft determination.

No.	Heading	Participant	Participant Comments	AEMO response
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Evoenergy	Yes	AEMO notes the response.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Endeavour Energy	Yes, we agree with the proposed Defect flag allowing an MC to record a defect in MSATS.	AEMO notes the response.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Ausgrid	<p>Yes.</p> <p>LNSP must have visibility of this flag (pending the outcome of the final rule).</p> <p>Allowing the LNSP visibility of the defect flag allows the LNSP to make an assessment of whether the site has been visited by an MP and a defect exists. This in turn allows the LNSP to make an assessment on meter reading route scheduling and when to convert walking routes to an alternate strategy.</p> <p>Allowing LNSP defect visibility, would also assist in minimising wasted LNSP scoping visits. If a retailer raises a TIGS scoping SO on a NMI where a defect already exists for another NMI associated with the scoping, which the retailer who is raising the new TIGS scoping SO has no visibility of, the LNSP could close off the SO as defect exists to that retailers scoping SO request.</p> <p>As it is proposed that the defect flag should remain in use after the acceleration period, Ausgrid suggest that the defect flag should be able to be used on non legacy meter NMIs.</p>	AEMO has included defect type as part of this draft determination. AEMO notes this process will be used ongoing after the acceleration period for legacy meters only.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	EnergyAustralia	EA Support this	AEMO notes the response.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Intellihub	<p>We prefer for the nature of defect to be allowed in MSATS, as opposed to only a flag indicating the presence of a defect. This will allow retailers, and any subsequent retailers who wins the NMI, to have appropriate information to allow them to communicate to customers the nature of the defect.</p> <p>We note:</p> <p>a) the draft rule allows AEMO to ‘... specify the information that must be recorded by a Metering Coordinator where it identifies a site defect during a site visit to replace a Legacy Meter’</p> <p>b) AEMO has expressed concerns about the ‘...need to adhere to Protected Information management requirements under the NEL and ensure the NER provides a clear and transparent operational framework’</p>	AEMO has included defect type as part of this draft determination.

No.	Heading	Participant	Participant Comments	AEMO response
			<p>c) AEMO states 'AEMO does not consider "defect" information to fall under NMI Standing Data or Metering Data as currently defined. Amending either definition to include "defect" information would be impractical and likely result in unintended consequences. By nature, "defect" information is temporal and pertains to the customer's electrical installation, actions, or premises. AEMO believes that "defect" information should not be stored in MSATS, and interested parties should consider developing B2B transactions for this information'</p> <p>However:</p> <p>a) currently MSATS has a field called 'hazard' and is defined as 'Free text or code identifying hazards associated with reading, maintaining or installing the meter. If the following are present at the metering installation, they should be listed in this field: Asbestos'</p> <p>b) One of the allowable values we wish to define for defect is 'Asbestos'</p> <p>c) We believe the information we want to populate for defects is similar to hazards and given the field called 'hazard' already exists we believe there will be no additional risk for AEMO in complying with their Protected Information obligations</p> <p>Therefore, we would be pleased to work with AEMO to define a new field for defects with a definition to limit this field to information related to technical scenarios that prevents the installation of a meter, does not include any information related to the customer and any other information AEMO wishes to exclude.</p>	
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors	N/A
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors	N/A
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Energy Queensland	Energy Queensland agrees with the proposed defect flag. However, while we agree with the proposal, we are of the view that there would be greater value to all participants if the flag also identified the defect type. This could be done by having an enumerated value for the indicator as opposed to a simple yes/null indicator. This would allow the presence of a defect and the defect type to be captured in a single field where the enumerated value would identify pre-agreed defect types.	AEMO has included defect type as part of this draft determination.

No.	Heading	Participant	Participant Comments	AEMO response
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	PlusES	<p>PLUS ES' preference is for the Defect Type to be in MSATS instead of a flag. The subsequent process of trying to obtain the defect type via B2B mechanism is restrictive, and does not cater for scenarios where the MC is no longer the MC at the NMI.</p> <p>We also acknowledge AEMO's concerns regarding potential Privacy Act implications, however, a combination of B2M and B2B transactions to communicate the Defect Type compared to one field in MSATS, requires participants to incur unnecessary operational costs which does not provide them the transparency of the MSATS alternative.</p>	AEMO has included defect type as part of this draft determination.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Red & Lumo	Yes, an MC should be able to update defect fields in MSATS using a CR50XX. The nature of the defect, the original MC and the date the defect was identified should be recorded.	AEMO has included defect type as part of this draft determination.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	TasNetworks	TasNetworks believes this approach aligns with the requirements of the draft rule, noting that this is only for the contestable MC to populate this, not the DNSP as a site's Initial MC.	AEMO notes the response.
1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Alinta		N/A
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	AGL	<p>AGL has provided feedback to the AEMC that the defect notice process should be reset on change of retailer/customer, as we believe notices sent by different retailers to customers, with them potentially only receiving one notice or no notices, may not have the same impact or benefit as receiving both notices.</p> <p>Should this feedback be adopted into the final rule change, we believe the Site Remediation Status Date field would not be needed as each retailer would trigger notices on receiving a defect transaction and track the notices they have issued, as is done with other customer communications.</p> <p>However, should the rule change remain the same we believe these inclusions will be sufficient as we note AEMO can only operate within the outline of the rules.</p>	This process has been removed as part of the Final Determination
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site	Origin Energy	Agree, however in addition to these two fields, we also suggest 'Defect Type' to be included in MSATS.	This process has been removed as part of the Final Determination

No.	Heading	Participant	Participant Comments	AEMO response
	Remediation Status Date to track site defects?			
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Bluecurrent	No. We propose that there should be two date fields added to MSATs that track the first and second defect notices. It is not necessary to have a Site Remediation Status. The defect flag (or Nature-of-defect) will indicate that a defect is present (or not). After retailers have sent the first and second notices (required to be tracked by the rules) and followed up the customer within the regulated time frames. The presence of the flag within the defect notification periods and beyond will indicate the reason why a meter exchange has not proceeded as required by the LMRP schedule. This is a much simpler approach to managing this information.	This process has been removed as part of the Final Determination
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	SA Power Networks	No comment.	N/A
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Evoenergy	It will do	This process has been removed as part of the Final Determination
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Endeavour Energy	Yes, we agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects.	This process has been removed as part of the Final Determination
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Ausgrid	Yes.	This process has been removed as part of the Final Determination

No.	Heading	Participant	Participant Comments	AEMO response
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	EnergyAustralia	EA Support this	This process has been removed as part of the Final Determination
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Intellihub		N/A
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	CitiPower Powercor		N/A
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	United Energy		N/A
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Energy Queensland	Energy Queensland broadly agrees with the proposed approach.	This process has been removed as part of the Final Determination
2	Do you agree with the proposed approach of creating two new standing data attributes of Site	PlusES	The Site remediation status field will inform/guide 'new' roles about the status, especially in instances of FRMP churn. For full benefit realisation, there is a dependency on customers notifying/advising their retailer of site remediations and for all retailers to consistently update the field.	This process has been removed as part of the Final Determination

No.	Heading	Participant	Participant Comments	AEMO response
	Remediation Status and Site Remediation Status Date to track site defects?			
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Red & Lumo	<p>No, these fields communicating retailer notifications to a customer do not belong in MSATS.</p> <p>As long as the date the defect was identified is recorded in MSATS by the MC, then any retailer can initiate or continue the notification process by identifying the business days after the site defect was first recorded in MSATS.</p>	This process has been removed as part of the Final Determination
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	TasNetworks	TasNetworks considers that the approach taken in relation to tracking the remediation of site defects should align with the preferences of retailers, in accordance with the rule's intent.	This process has been removed as part of the Final Determination
2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Alinta		
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	AGL	<p>In line with our position of changes to the proposed rule change in question 2), we believe 'FirstNotice' & 'SecondNotice' should be removed, and retailers can track these notices in their individual systems – again, recognising AEMO can only operate within the rules.</p> <p>However, should the rule change remain unchanged in its current notification requirements we believe the proposed enumerations are largely acceptable.</p> <p>Independent of modifications to the rule, we do recommend amending the value of 'RemediationSuccessful' to 'RemediationAdvised'. We believe this is more in line with the definition, where it refers to the customer advising that the defect has been rectified, however does not guarantee the success of the rectification. In line with our previous comment, no change should be made to the Defect Status until the MP has exchanged the meter.</p> <p>Further, AGL notes that the enumerations listed in both the B2B and B2M processes should be consistent – e.g. either both 'RemediationAdvised' or 'RectificationAdvised'.</p>	This process has been removed as part of the Final Determination

No.	Heading	Participant	Participant Comments	AEMO response
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Origin Energy	Origin agrees with the allowed values, however for avoidance of doubt, Origin suggests that since 'RemediationSuccessful' is based on customer advise and may not be the true reflection of remediation status unless MP revisits and confirms. Origin suggests a clear definition of this value and updating the name to 'RemediationConfirmed.'	This process has been removed as part of the Final Determination
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Bluecurrent	No. This field is not necessary.	This process has been removed as part of the Final Determination
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	SA Power Networks	No comment.	N/A
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Evoenergy	Yes	This process has been removed as part of the Final Determination
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Endeavour Energy	Yes, we agree with the proposed enumerations which indicate the steps in the Site Remediation Staus process.	This process has been removed as part of the Final Determination
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Ausgrid	Yes.	This process has been removed as part of the Final Determination
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	EnergyAustralia	EA Support this.	This process has been removed as part of the Final Determination
3	Do you agree with the proposed enumerations which indicate the steps in	Intellihub		N/A

No.	Heading	Participant	Participant Comments	AEMO response
	the Site Remediation Status process?			
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	CitiPower Powercor		N/A
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	United Energy		N/A
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Energy Queensland	Energy Queensland broadly agrees with the proposed enumerations.	N/A
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	PlusES	<p>PLUS ES proposes the following editorial changes:</p> <ul style="list-style-type: none"> RemediationSuccessful – could be misleading when communicating that a customer has advised the defect has been remediated. It does not necessarily mean it is ‘successful’. Suggest a more general term of ‘Remediation Advised’. RemediationUnsuccessful – similarly this also could be misleading. This information needs to communicate that the customer has not remediated the defect or the retailer has been unable to confirm with the customer. Suggest a more general term of Unremediated. 	This process has been removed as part of the Final Determination
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Red & Lumo	<p>No, please see response to question 2.</p> <p>Red and Lumo suggest that a standing data field indicating the date the defect was identified removes the requirement for a new CR to be created for retailer notifications and thus reduces the total number of enumerations as well.</p>	This process has been removed as part of the Final Determination
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	TasNetworks	TasNetworks does not have a position on the enumeration of steps in the site remediation process and considers that AEMO should be guided in this regard by the preferences of retailers, in accordance with the rule’s intent.	This process has been removed as part of the Final Determination

No.	Heading	Participant	Participant Comments	AEMO response
3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Alinta		N/A
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	AGL	Standing Data quality reports will prove useful; however, we believe that providing detail on what should be included in these reports would need to be determined once the rule change has been finalised.	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Origin Energy	Origin recommends a new SQ report to be developed and sent to the current FRMPs every week as an RM-xx individual results and summary report. The key components of this RM report should provide any errors in the standing data, e.g. NMLs with missing values in Site Remediation Status and Dates where defect has been flagged.	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Bluecurrent	It is unclear why these reports would be necessary and for whom? The retailer or the MC.	AEMO notes the response
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	SA Power Networks	No comment.	N/A
4	Are standing data quality reports required to be	Evoenergy	Generally No, as participants understand their obligations and already report to AER.	AEMO has proposed the following reports to industry consideration:

No.	Heading	Participant	Participant Comments	AEMO response
	created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?		May want a monthly automated report for FRMP/MC where: Defect field populated, and SiteRemediationStatus is Third[or Final]Notice, and SiteRemediationDate is older than 60 business days.	(1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Endeavour Energy	No, we would not be requiring standing data quality reports for us to meet our obligations as related to site defects.	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Ausgrid	Ausgrid does not require reports for defect, just visibility of them in MSATS NMI standing data.	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	EnergyAustralia	The report required needs to contain the NMI; LMRP date; Defect type; site remediation status;	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Intellihub		N/A

No.	Heading	Participant	Participant Comments	AEMO response
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	CitiPower Powercor		N/A
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	United Energy		N/A
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Energy Queensland	Energy Queensland is of the view that no specific SDQR are required to be created for participants to meet their procedural obligations for defects. However, as stated above, if SDQR were to be required, we see value in it being made available for all participants and to incorporate the components suggested in response to Question 4.	N/A
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	PlusES	<p>PLUS ES supports that standing data quality reports would deliver benefits. Some SDQ proposals for consideration:</p> <ul style="list-style-type: none"> • A report identifying a Defect flag has been assigned and Remediation status has not been entered. • Remediation status is not updated within timeframes i.e. first notice enumeration is greater > 3mths, should have changed to second notice or remediation successful. • A Remediation Successful status >20 business days and no meter exchange. 	<p>AEMO has proposed the following reports to industry consideration:</p> <ol style="list-style-type: none"> (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Red & Lumo	Red and Lumo have not identified any requirement for standing data reports to meet procedural obligations.	<p>AEMO has proposed the following reports to industry consideration:</p> <ol style="list-style-type: none"> (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date

No.	Heading	Participant	Participant Comments	AEMO response
4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	TasNetworks	TasNetworks believes that it will not have any procedural obligations in relation to site defects and, therefore, will not have any SDQ reporting requirements.	AEMO has proposed the following reports to industry consideration: (1) 'BASIC' or 'MRIM' sites where the LMRP date is in the past with no defect (2) 'BASIC' or 'MRIM' sites without an LMRP date (3) Not ('BASIC' or 'MRIM') meters with an LMRP date
f4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Alinta		N/A
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	AGL	Our preference is Option 2, where the relevant metering Party who sets the Flag can use the same transaction to set Defect Flag to Null or Rectified. When this is submitted, the Site Remediation Status and Date will be set in MSATS. We believe this will limit instances of flags being updated incorrectly and increases the integrity of standing data. AGL also notes, that as a site with Defects is exempted from the Retailer Obligations to replace a meter, that comprehensive history and status update reports of this field against the NMIs will also be required. This should be factored into the AEMO build. Further, AGL also considers that there is no reason the defect process should end with the LMRP obligations. This process can be expanded to include COMMS meters (and manage the inevitable fleet of legacy meters which will remain in the NEM for many years to come).	AEMO note AGL's preference. The draft Determination has proposed Option 1.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Origin Energy	Origin supports option 1, i.e. where a legacy meter has been replaced on-site, the Defect Flag, Site Remediation Status and Site Remediation Date will be set to Null by AEMO.	AEMO notes Origin's preference. The draft Determination has proposed Option 1.

No.	Heading	Participant	Participant Comments	AEMO response
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Bluecurrent	Yes we support MSATS nulling out defect fields on a Smart meter exchange. Option 1. On a CR 30xx that indicates a smart meter has been installed the flag is nulled out.	AEMO notes Bluecurrent's preference. The draft Determination has proposed Option 1.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	SA Power Networks	SAPN sees Option 1 as the most efficient process and is our preferred option.	AEMO notes SAPN's preference. The draft Determination has proposed Option 1.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Evoenergy	Option 1 does not include what to do if a 3051 and 3001 are submitted instead of a 3004/3005. Preferred Option 2	AEMO notes Evoenergy's preference and commentary. The draft Determination has proposed Option , with the ability of the MC to nullify fields where CRs that are not 3004/3005 are chosen to replace a legacy meter. .
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Endeavour Energy	Option 1: For 3004/3005 or 3090/3091 only, where a legacy meter has been replaced on-site, the Defect Flag, Site Remediation Status and Date will be set to Null by AEMO. This option has the least development and administrative overhead.	AEMO notes INTEG preference. The draft Determination has proposed Option 1.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation	Ausgrid	Ausgrid supports option 1 or 2.	AEMO notes Augrid's preference.

No.	Heading	Participant	Participant Comments	AEMO response
	date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?			
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	EnergyAustralia	Option 2, is preferred. This will give an audit trail to follow if required and will also be able to be managed by just the one party raising the CR and then AEMO being able to manage the updates.	AEMO notes EA's preference. The draft Determination has proposed Option 1.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Intellihub	<p>Our 1st preference is option 1 because this option:</p> <ul style="list-style-type: none"> results in a lower volume of transactions in the market compared to the other options helps to avoid having conflicting information - the other options require multiple participants to use multiple CRs to update the information in MSATS which means for a period of time the information in MSATS would be conflicting <p>Our 2nd preference is option 3 because this only requires us to create in our system 1 CR code to update and clear the defect flag (unlike option 2 where 1 CR code is required to set the defect flag and another CR code is required to clear the defect flag)</p>	AEMO notes Intellihub's preference. The draft Determination has proposed Option 1.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	CitiPower Powercor		N/A
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a	United Energy		N/A

No.	Heading	Participant	Participant Comments	AEMO response
	smart meter replaces a legacy meter which had a defect? Why is this option preferred?			
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Energy Queensland	<p>Energy Queensland's preferred option is Option 1.</p> <p>We are of the view that this is the best approach as it is automated and will reduce the risk of sync issues between flags and status. Further, due to the meter exchange only being able to be completed following the rectification of any site defects, the option to update the relevant defect fields automatically minimises any risk of participants failing to update or incorrectly updating these fields.</p> <p>In some scenarios the updating of a meter exchange in MSATS may also be actioned via the completion of a CR3050/51 to remove the legacy meter and a CR3000/01 to install the smart meter. We would appreciate clarification from AEMO as to whether the completion of this pair of transactions (actioned together) would also trigger the defect fields to be nullified?</p>	AEMO notes EQL's preference. The draft Determination has proposed Option 1. AEMO notes that the ability of the MC to nullify fields where CRs that are not 3004/3005 are chosen to replace a legacy meter.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	PlusES	<p>PLUS ES supports that the defect process scope should be expanded to include COMMS metering sites with defects and that it is maintained beyond the LMRP timeframe.</p> <p>We support AEMO's option 1 proposal for legacy meters as this would reduce the volume of transactions in the market. However, this option must be expanded to include COMMS meters. Where a 3004/05 or 3090/91 changes the meter number for an existing COMMS meter, the defect attributes are set to NULL or an alternative value.</p>	AEMO notes PlusES's preference. The draft Determination has proposed Option 1. The defect field will only apply to legacy meters.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Red & Lumo	<p>Nullifying the defect when a legacy meter has been replaced on-site, and a CR 3004/3005 or 3090/3091 is received seems simplest, however;</p> <ul style="list-style-type: none"> . What if the defect is identified after a MFN behind a Type 4 comms meter? . What if the defect affects a Type 4 comms meter in a Shared Fuse arrangement with a Type 5 or 6 meters? <p>It is preferable for the MC to set the defect field to NULL when the new meter is installed and the site defect is confirmed to be resolved.</p>	The draft Determination has proposed Option 1.
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a	TasNetworks	<p>TasNetworks believes that option 1 would be the preferred approach. This would negate the need for participants to send transactions and reduce any time delay of the records being nullified.</p> <p>TasNetworks does, however, note that option 1 would also need to include CR3001 transactions. Alternatively, a daily check of MSATS could be done on</p>	AEMO notes Tasnetworks preference. The draft Determination has proposed Option 1.

No.	Heading	Participant	Participant Comments	AEMO response
	legacy meter which had a defect? Why is this option preferred?		all NMI's where the defect fields are not null and the meter class code is not a legacy meter type, and if true, then null the defect fields.	
5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Alinta		N/A
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	AGL	No.	N/A
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Origin Energy	No further comments	N/A
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Bluecurrent	No.	N/A
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your	SA Power Networks	No comment.	N/A

No.	Heading	Participant	Participant Comments	AEMO response
	reasoning and details of your alternative approach			
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Evoenergy	At Step 3 of the Site Defect, Step ID 7. This was already set to SecondNotice in Step 2 of the Site Defect. This should read ThirdNotice or FinalNotice.	AEMO thanks Evoenergy for the correction.
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Endeavour Energy		
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Ausgrid	No.	
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	EnergyAustralia	N/A	N/A
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Intellihub		N/A
6	Do you believe an alternative option/approach	CitiPower Powercor		N/A

No.	Heading	Participant	Participant Comments	AEMO response
	would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach			
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	United Energy		N/A
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Energy Queensland	As stated above, our preferred option is the proposed Option 1. However, we would appreciate further clarification as to whether AEMO has considered a mechanism to notify all Retailers of a defect, where a defect has been identified at a shared fuse installation by the original attending Metering Coordinator that will impact all NMs. Additionally, we are of the view that there would be value to participants in having the defect flag to also identify the defect type and for a simplified process for tracking customer notices to be managed by retailers.	The final rule allows the current FRMP to view a defect. AEMO has proposed an enumeration in Defect Type, which identifies a defect at a share fuse.
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	PlusES	In addition to the above, PLUS ES proposes the enumerations for a Defect flag are NULL, Y (Yes) and N (No), where: <ul style="list-style-type: none"> • NULL= no defect has been identified for this site • Y = Defect exists on site preventing metering installation and • N = Defect existed on site but is no longer present 	AEMO's position is to support only 'Y' and NULL. 'Y' indicates a defect identified by the MC, and NULL is used during automated CR processing upon meter replacement (from 'BASIC' or 'MRIM' to 'COMMS*' or 'MRAM'). We see no compelling reason to track the previous existence of a defect ('N' status) after resolution.
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Red & Lumo	Providing a Date Identified field for the MC site defect CR 50XX removes the requirement for a new CR to be created for retailer notifications (presuming amendment of the AEMC rule) and thus reduces the total number of enumerations as well.	AEMO has maintained
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes,	TasNetworks	As per response the question 5, TasNetworks suggests an alternative approach for consideration, under which AEMO could perform a daily check on all non-extinct NMs in MSATS to identify where the defect fields are not	AEMO thanks Tasnetworks for the suggestion, however AEMO have proposed option 1.



No.	Heading	Participant	Participant Comments	AEMO response
	please provide your reasoning and details of your alternative approach		null and the meter class code is not a legacy meter type, and if true, then null the defect fields.	
6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Alinta		N/A

5.1.2. Retailer of Last Resort

No.	Heading	Participant	Participant Comments	AEMO response
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	AGL	<p>AGL supports the proposed changes.</p> <p>AGL notes that the various diagrams and cross references within the AEMO documents are out of alignment.</p> <p>As part of this set of changes, the Document needs to be edited to update diagrams and ensure correct referencing within these procedures.</p>	AEMO notes the respondent's support for the proposal
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Origin Energy	Origin agrees with the proposed approach	AEMO notes the respondent's support for the proposal
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Bluecurrent	<p>Editorial - Section 11.2 should be reviewed there are clauses which make reference to other clauses which appear to be incorrect due to new numbering. Eg.</p> <p>(g)(e) For each <i>NMI</i> identified by running the report specified in section 11.2(f), individually update the records for each of those <i>NMIs</i> to change their FRMP from the Failed Retailer to the <i>RoLR</i> and, for the period from the RoLR Effective Transfer Date to the date that is the day before the date the Current FRMP became the FRMP.</p> <p>(h)(f) In completing section 11.2(f), do not change any Roles other than the FRMP.</p> <p>(i)(g) In completing section 11.2(f), apply the following for each individual <i>NMI</i>:</p> <p>And</p> <p>(k)(i) In the email referred to in section 11.2(i):</p> <ul style="list-style-type: none"> (i) Confirm that all updates of FRMPs are now completed; and (ii) If there are no RoLR Roles to update and section 17 is not required (because the Failed Retailer is still operating in some Jurisdictions), confirm that there are no other updates required in MSATS. <p>(l)(j) Compliance with section 11.2(l) is not required if there are further updates to do in MSATS.</p> <p>And</p>	AEMO has made a number of changes to the draft procedure to correct clause cross references and improve the overall readability of the document.

No.	Heading	Participant	Participant Comments	AEMO response
			<p>15.1. Conditions Precedent</p> <p>(a) The MDP has received any of the following:</p> <p>(i) An Change Request Notification with a COM status for a change of FRMP generated as a result of the application of section 10.1(c), 11.2(d)(iv), 11.2(e)(iii), 11.2(i)(v), 13.3(d)(v), or 13.3(i)(v) advising, for each RoLR Event Affected NMI where the Failed Retailer was the Current FRMP, which <i>Market Participant</i> is the New FRMP and the date of effect of the change (the <i>ActualChangeDate</i> in the Change Request Notification), which is the RoLR Effective Transfer Date.</p> <p>Note: Change Request Notifications generated as a result of the application of section 11.2(d)(iv), 11.2(e)(iii), 11.2(i)(v), 13.3(d)(v), 13.3(e)(iii) or 13.3(i)(v) will be easily identifiable because they use the Change Reason Code of <i>ROLR</i>. The <i>NMIs</i> for which COM status Change Request Notifications are generated as a result of compliance with section 10.1(c) are not so easily identified because they will have a <i>business as usual</i> Change Reason Code. These ones are able to be identified from the report supplied by AEMO in compliance with section 10.1(g).</p> <p>And</p> <p>18.1. Conditions Precedent</p> <p>AEMO has sent the email indicating that all updates to MSATS are complete, required by one of sections 11.2(k)(ii), 12.2(f), 13.3(m)(ii), 16.1(f), or 17.2(b).</p> <p>Note: The section that triggers the requirement to send the email will depend on what tasks are required.</p> <p>And</p>	

No.	Heading	Participant	Participant Comments	AEMO response
			<p>103.2. Conditions Precedent</p> <p>(a) The MDP has received any of the following:</p> <p>(i) An MSATS Change Request Notification with a COM status for a change of FRMP generated as a result of the application of clause 10.1 c), clause 11.2 d) iv), clause 11.2 h) v), clause 13.3 d) v) or clause 13.3 h) v), advising, for each RoLR Event Affected NMI where the Suspended Retailer was the Current FRMP, which <i>Market Participant</i> is the New FRMP and the date of effect of the change (the <i>ActualChangeDate</i> in the MSATS Change Request Notification), which is the RoLR Effective Transfer Date.</p> <p>Note: MSATS Change Request Notifications generated as a result of the application of clause 11.2 d) iv) or clause 13.3 d) v) will be easily identifiable because they use the Change Reason Code of <i>ROLR</i>. The <i>NMIs</i> for which COM status MSATS Change Request Notifications are generated as a result of compliance with clause 10.1 c) are not so easily identified because they will have a <i>business as usual</i> Change Reason Code. These ones are able to be identified from the report supplied by AEMO in compliance with clause 10.1 g).</p>	
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	SA Power Networks	SAPN supports the proposed change.	AEMO notes the respondent's support for the proposal
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Evoenergy	Yes, too many to monitor yet generally have the same information. There are References in this document that refer to sections deleted [11.2.(f)]	AEMO has made a number of changes to the draft procedure to correct clause cross references and improve the overall readability of the document.
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Endeavour Energy	We agree with the removal of the ROLR reports as proposed.	AEMO notes the respondent's support for the proposal
1	Do you agree with the removal of the RoLR reports	Ausgrid	Yes. Ausgrid notes that the referencing in the procedures has not been updated and do not align. Suggest AEMO conduct a review and update as required.	

No.	Heading	Participant	Participant Comments	AEMO response
	as proposed? If not, why?			
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	EnergyAustralia	Yes EA support this	AEMO notes the respondent's support for the proposal
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Intellihub	<p><u>Glossary and Framework document</u></p> <p>We suggest the term 'RoLR Event Affected MSATS Participant' be updated to include the current MC in the Glossary and Framework document</p> <p><u>ROLR Processes Part A</u></p> <p>Figure 2 High Level ROLR Process Diagram:</p> <p>The ROLR Procedure mentions reports as Group 1, Group 2 and Group 3 in Figure 2 (High level ROLR process diagram) and Figure 3 (High level ROLR process timeline). However it is not clear which report belongs to which group. Could the ROLR Procedure be updated to make it clearer which report belongs to which group?</p> <p>Clause 5.1.a:</p> <p>If reports are to be moved to participant outbox then we need a better notification process and this should be clearly documented. We note in clause 5.1.a AEMO has an obligation to only send a notification to a RoLR Affected MSATS Participant within 1 business hour of a ROLR event being declared. However for AEMO to determine RoLR Affected MSATS Participants AEMO would need to determine the NMI's impacted and the participants for these NMI's, which will require time and effort for AEMO. We believe it would be more effective if AEMO informs all participants in the NEM at this step of the process. Therefore, we suggest clause 5.1.a be updated to:</p> <p style="padding-left: 40px;">Within one Business Hour of the announcement of the occurrence of a RoLR Event by a Regulator, send an email to each RoLR Key Contact and issue a market notice advising of the following:</p> <p>Clause 5.1.a.i:</p>	The reference to report Group is for AEMO internal processing

No.	Heading	Participant	Participant Comments	AEMO response
			<p>We suggest the following be added: participant id of the failed retailer, effective date and time of the when the failed retailer is not allowed to operate and the jurisdiction the failed retailer is not allowed to operate</p> <p>Clause 6.1</p> <p>It is not clear why AEMO is obligated to produce ROLR_001 (clause 6.1.a) but only deliver this report after completing the steps described in sections 11 and 12 (clause 6.1.d.iii) – are you able to clarify this?</p> <p>Clause 7.1.b:</p> <p>We suggest MPB be added</p> <p>Clause 7.2:</p> <p>Of all the reports the most important for us is ROLR_013 because it provides the list of NMs. However, the timing of this report, as defined in section 7.2, is after completion of obligations defined in section 6.1(d), which is updating the FRMP in MSATS away from the Suspended Retailer. We believe this report should be delivered before MSATS gets updated otherwise it will have little value. Could you please confirm what is the prerequisite for ROLR_013 and if necessary update the ROLR Procedure to make this clearer?</p> <p>APPENDIX 1. Specifications for RoLR reports</p> <ul style="list-style-type: none"> • ROLR_014: We agree that ROLR_014 can be deleted if ROLR_013 got updated to include NMs where the failed retailer is the ENLR. If ROLR_013 is not updated then ROLR_014 should be maintained. ROLR_014 is required for contestable MC/MP/MDP to manage inflight service orders – see clause 104.7.i • ROLR_016: suggest this be deleted. Currently LNSPs only have visibility of CR1xxx when it is COM therefore we believe this report is now redundant • ROLR_017: reword/redesign report to capture CRs where the proposed change date is before the ROLR effective transfer date and the end date is null or greater than the ROLR effective transfer date • ROLR_021: suggest this be deleted. There is no obligation on the Suspended Retailer related to this report • ROLR_022: suggest this be deleted. Currently LNSPs only have visibility of CR1xxx when it is COM therefore we believe this report is now redundant • ROLR_024: since a new MDP cannot be nominated with a CR1xxx we suggest it says ‘for each existing MDP’ instead of ‘for each existing or new MDP’ • ROLR_027 and ROLR_028: suggest the description makes reference to the RoC process to make it clearer what is the intent of this report 	<p>The process to change ENLR is an existing process with notification processes that update effected parties.</p> <p>AEMO will include this question in the draft determination</p> <p>AEMO considers that there is still value in these reports (21,22,31) to industry</p> <p>AEMO is comfortable with the current descriptions, the key difference is the recipient of the report.</p>

No.	Heading	Participant	Participant Comments	AEMO response
			<ul style="list-style-type: none"> ROLR_031: suggest this be deleted because at best this is a 'nice to have' report <p><u>ROCL</u></p> <p>The ROCL has a tab called 'All RoLR Information', however it is not clear what information it is trying to convey here – are you able to elaborate on what is the intent of this tab and how this information is used during a ROLR process?</p>	<p>ROCL:</p> <p>This information is used so AEMO and participants have a contact to send the email too, not the reports.</p>
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Energy Queensland	Energy Queensland agrees with the removal of the Retailer of Last Resort reports as proposed.	AEMO notes the respondent's support for the proposal
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Citipower Powercor	CitiPower Powercor supports the RoLR reports being removed	AEMO notes the respondent's support for the proposal
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	United Energy	United Energy supports the RoLR reports being removed	AEMO notes the respondent's support for the proposal
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	PLUS ES	<p>PLUS ES supports the removal of the proposed reports.</p> <p>PLUS ES recommends that the High Level Process figures are reviewed and amended to align with the final changes in the Procedure. For example, 6.1(d)(iii) has been amended to remove referencing of a communication mechanism for the reports. This should also be reflected in Figure 2.</p> <p>PLUS ES recommends that the whole procedure is reviewed and the clause referencing aligned. Amendments made to clauses have not been accurately reflected within the Procedure (Part A and B). Due to the quantity of misalignments, we have made a note that AEMO need to undertake the activity to ensure the document is updated accordingly.</p> <p>For example,</p> <ul style="list-style-type: none"> clauses have been deleted, yet they are still reference within the document e.g. 7.1(c). 	<p>AEMO notes the respondent's support for the proposal.</p> <p>AEMO has made a number of changes to the draft procedure to correct clause cross references and improve the overall readability of the document.</p>

No.	Heading	Participant	Participant Comments	AEMO response
			<ul style="list-style-type: none"> In Part B, we have also identified a change in the formatting of subclauses. E.g In Part A 7.1(c) but in Part B the clause has been formatted as 7.1 c). <p>Clause numbering have changed and the document is referencing old clause numbers, e.g. 11.2(k) etc.</p>	

5.1.3. Issue and Change Forms

No.	ICF	Question	Participant	Participant Comments	AEMO response
1.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	AGL	AGL supports the proposed changes.	AEMO notes the respondent's support.
2.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Ausgrid	Yes	AEMO notes the respondent's approval.
3.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Bluecurrent	No comment - not impacted.	AEMO notes the respondent's comment.
4.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	CitiPower Powercor	CitiPower Powercor supports the proposed changes.	AEMO notes the respondent's support.
5.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	EnergyAustralia	Yes EA support this	AEMO notes the respondent's support.
6.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Energy Queensland	Energy Queensland agrees that the proposed changes will achieve the desired objective.	AEMO notes the respondent's approval.

No.	ICF	Question	Participant	Participant Comments	AEMO response
7.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Evoenergy	Yes, reduces Change Requests therefore market traffic. Simplifies participant system requirements and costs, especially new participants.	AEMO notes the respondent's approval.
8.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Endeavour Energy	We agree with the proposed changes for AEMO to automate populate the LCCD field based on NMI status.	AEMO notes the respondent's approval.
9.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Origin Energy	Origin agrees with the proposed changes associated with this LCCD field	AEMO notes the respondent's approval.
10.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	PLUS ES	For future consultation consideration, PLUS ES supports having marked up documents at this stage would have enabled a more efficient and robust review of impacted documents.	AEMO notes the respondent's support.
11.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Red Energy and Lumo Energy	Red and Lumo support this proposal	AEMO notes the respondent's support.
12.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	SA Power Networks	SAPN supports the proposed changes.	AEMO notes the respondent's support.
13.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	TasNetworks	TasNetworks agrees with the proposed change. We acknowledge this will reduce transaction volumes for the initial setting of the LCCD for new NMIs. To be effective, retailers will also need to ensure they disable any existing automated generation of CR5056/5057 transactions upon G to A transition, else the transaction reduction benefit will be diluted.	AEMO notes the respondent's approval of the proposed changes and clarifies that it is up to the retailers to decide how they will manage the update process of the LCCD field.
14.	ICF 077	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	United Energy	United Energy supports the proposed changes.	AEMO notes the respondent's support.

No.	ICF	Question	Participant	Participant Comments	AEMO response
15.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	AGL	AGL supports the proposed changes.	AEMO notes the respondent's support.
16.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Ausgrid	Yes	AEMO notes the respondent's approval.
17.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Bluecurrent	Yes	AEMO notes the respondent's approval.
18.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	CitiPower Powercor	CitiPower Powercor supports the proposed changes.	AEMO notes the respondent's support.
19.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	EnergyAustralia	Yes EA support this	AEMO notes the respondent's support.
20.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Energy Queensland	Energy Queensland agrees that the proposed changes will achieve the desired objective.	AEMO notes the respondent's approval.
21.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Evoenergy	This is a long and awaited change to align the B2B and B2M address requirements.	AEMO notes the respondent's support.
22.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Endeavour Energy	We agree with the proposed changes	AEMO notes the respondent's support.
23.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Intellihub	For FlatOrUnitType, we believe the abbreviations defined in AS4590.1:2017 is more meaningful than what is defined in aseXML, therefore we suggest the aseXML be updated with the abbreviations defined in AS4590.1:2017 as opposed to describing the name mapping from AS4590.1:2017 to the aseXML. For example, for Factory having an abbreviation of 'FCTY' is more meaningful than 'F' and for Warehouse having an abbreviation of 'WHSE' is more meaningful than 'WE'.	AEMO notes the respondent's comment and clarifies that changing the enumerated values is not preferred as it will require every participant to have data transformation to make the changes, resulting in lots of cost and effort.

No.	ICF	Question	Participant	Participant Comments	AEMO response
24.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Origin Energy	Origin agrees with the proposed changes associated with address fields and supports the concept of establishing an Energy Addressing Standard linked to AS4590.1:2017. Having said that, Origin highly recommends a single release cycle to implement these schema changes across the board to ensure there are no address element mismatches in participants' application systems, especially for those who operate in both electricity and gas markets.	AEMO notes the respondent's support of the changes and suggests raising the recommendations regarding the gas changes in the Gas Market forums. The GMR is aware of this change and they can decide on the release cycles.
25.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	PLUS ES	PLUS ES agrees with the proposed changes. For future consultation consideration, PLUS ES supports having marked up documents at this stage would have enabled a more efficient and robust review of impacted documents.	AEMO notes the respondent's approval and comment.
26.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Red Energy and Lumo Energy	Red and Lumo agree with AEMO's assessment and suggest Option 2 is preferable.	AEMO notes the respondent's approval.
27.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	SA Power Networks	SAPN supports the proposed changes. However, we do not believe there is any urgency to implement this change. Given this change require changes to the schema, SAPN see it should not proceed on its own and can wait to be included with other changes where a schema change is justified.	AEMO notes the respondent's support of the changes and notes that the schema changes for ICF-078 are included with other schema changes that are part of MSR package 1.
28.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	TasNetworks	TasNetworks agrees with the proposed approach and believes it should achieve the desired objective.	AEMO notes the respondent's approval.
29.	ICF 078	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	United Energy	United Energy supports the proposed changes.	AEMO notes the respondent's support.
30.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	AGL	AGL supports the proposed changes.	AEMO notes the respondent's support.
31.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification	Ausgrid	Yes	AEMO notes the respondent's approval.

No.	ICF	Question	Participant	Participant Comments	AEMO response
		NEM12 & NEM13, will achieve the desired objective? If not, why?			
32.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Bluecurrent	Yes	AEMO notes the respondent's approval.
33.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	CitiPower Powercor	<p>CitiPower Powercor suggests the proposed changes still provide ambiguity and seeks clarification on the following:</p> <p>Section 4.4 Interval data record (300)</p> <ul style="list-style-type: none"> 300 record - <i>Where the same QualityMethod and ReasonCode apply to all IntervalValues in the 300 record, the QualityMethod, ReasonCode and ReasonDescription in the 300 Record must be used. If either of these fields contains multiple values for the IntervalValues, the QualityMethod in the 300 record must be set to "V" and the 400 record must be provided</i> <p>Does this imply we can't have (use?) multiple codes (eg 79, 89, and 61) and also use "A"?</p> <ul style="list-style-type: none"> Quality method - <i>The QualityMethod applies to all IntervalValues in this record. Where multiple QualityMethods or ReasonCodes apply to these IntervalValues, a quality flag 'V' must be used</i> <p>As above, does this imply we can't have (use?) multiple codes (eg 79, 89, and 61) and also use "A"?</p> <p>Section 4.5 Interval event record (400)</p> <ul style="list-style-type: none"> 400 record - <i>This record is mandatory where the QualityFlag is 'A' or 'V' in the 300 record and the quality or reason codes are not the same across the entire day, then the 400 line must be provided</i> <p>Does this now imply we can have (use?) an "A" with multiple codes?</p> <ul style="list-style-type: none"> Quality method - <i>If quality flag = "A" no method required</i> 	AEMO notes the respondent's comment and has revised the definition of QualityMethod in table under 4.5 and example of 400 record where quality flag = A and ReasonCode is 61, 79 or 89.

No.	ICF	Question	Participant	Participant Comments	AEMO response
				For reason codes 79, 89, and 61 a quality method must be provided. CitiPower Powercor recommend the following word amendment: "If quality flag = "A" the method is optional" or "If quality flag = "A" the method must be provided if it is 79, 89, or 61"	
34.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	EnergyAustralia	Yes EA support this	AEMO notes the respondent's support.
35.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Energy Queensland	Energy Queensland agrees that the proposed changes will achieve the desired objective.	AEMO notes the respondent's approval.
36.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Evoenergy	Yes. It allows clearer usage of what is already the current practice.No comment	AEMO notes the respondent's approval.
37.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Endeavour Energy	Yes we agree with the proposed changes	AEMO notes the respondent's approval.
38.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Origin Energy	Origin has no objections with this proposal	AEMO notes the respondent's comment.
39.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	PLUS ES	PLUS ES supports the changes.	AEMO notes the respondent's support.
40.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Red Energy and Lumo Energy	Red and Lumo support this change as it appears to address the issue.	AEMO notes the respondent's support.
41.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification	SA Power Networks	SAPN supports the proposed changes.	AEMO notes the respondent's support.

No.	ICF	Question	Participant	Participant Comments	AEMO response
		NEM12 & NEM13, will achieve the desired objective? If not, why?			
42.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	TasNetworks	TasNetworks acknowledges that the proposed changes should remove any interpretation discrepancy. We note however that the words ‘then the 400 line must be provided’ are superfluous and are not required, as it is stated that ‘This record is mandatory where....’	AEMO notes the respondent’s comment has a removed the superfluous wording.
43.	ICF 079	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	United Energy	<p>United Energy suggests the proposed changes still provide ambiguity and seeks clarification on the following:</p> <p>Section 4.4 Interval data record (300)</p> <ul style="list-style-type: none"> • 300 record - <i>Where the same QualityMethod and ReasonCode apply to all IntervalValues in the 300 record, the QualityMethod, ReasonCode and ReasonDescription in the 300 Record must be used. If either of these fields contains multiple values for the IntervalValues, the QualityMethod in the 300 record must be set to “V” and the 400 record must be provided</i> <p>Does this imply we can’t have (use?) multiple codes (eg 79, 89, and 61) and also use “A”?</p> <ul style="list-style-type: none"> • Quality method - <i>The QualityMethod applies to all IntervalValues in this record. Where multiple QualityMethods or ReasonCodes apply to these IntervalValues, a quality flag ‘V’ must be used</i> <p>As above, does this imply we can’t have (use?) multiple codes (eg 79, 89, and 61) and also use “A”?</p> <p>Section 4.5 Interval event record (400)</p> <ul style="list-style-type: none"> • 400 record - <i>This record is mandatory where the QualityFlag is ‘A’ or ‘V’ in the 300 record and the quality or reason codes are not the same across the entire day, then the 400 line must be provided</i> <p>Does this now imply we can have (use?) an “A” with multiple codes?</p> <ul style="list-style-type: none"> • Quality method - <i>If quality flag = “A” no method required</i> 	AEMO notes the respondent’s comment and has revised the definition of QualityMethod in table under 4.5 and example of 400 record where quality flag = A and ReasonCode is 61, 79 or 89.



No.	ICF	Question	Participant	Participant Comments	AEMO response
				<p>For reason codes 79, 89, and 61 a quality method must be provided.</p> <p>United Energy recommend the following word amendment: "If quality flag = "A" the method is optional" or "If quality flag = "A" the method must be provided if it is 79, 89, or 61"</p>	



5.1.4. Embedded Network Settlement Anomalies

No.	Question	Participant	Participant Comments	AEMO response
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	AGL	<p>AGL does not support these changes at this stage.</p> <p>While we understand AEMO’s proposal in limiting retrospective changes may allow for more accurate settlements, we believe this proposal requires further discussion to understand how this impacts genuine error correction scenarios that may occur, in addition to other issues that may not be immediately apparent.</p> <p>AGL believes that this may generate unintended consequences for industry and customers in its current state. Accordingly, AGL would welcome the opportunity to work with industry participants and AEMO to further explore this – potentially with the establishment of a targeted working group.</p>	AEMO notes the response and has considered this feedback in its draft determination.
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Origin Energy	<p>Origin has concerns with AEMO’s proposal and do not agree with the proposal to no longer allow retrospective NMI activation and deactivation as it will have a negative impact on our on-market embedded network (EN) customers. All NMI activations and deactivations are retrospectively applied. This is due to us being notified after the fact of a meter change. No longer allowing for these changes to be retrospectively applied will cause billing issues for our on-market customers.</p> <p>To provide further context, the instance where an EN customer has gone on-market (i.e. left the embedded network), it often takes 2-3 days (sometimes up to a week) for a meter replacement to take place and then advise Origin of the new meter.</p> <ul style="list-style-type: none"> Origin ENM then process a change request to update the status of the NMI to reflect that the new meter is “A” = Active If the customer is moving to off-market, we change the status to “N” = Non-Active. <p>These advices, as to the change of meter, can only be processed by us once we are advised of the new meter details. We then back-date the status change to equal the meter exchange date. The status change date is important, as this is the official date that the new Retailer can take over the billing for this meter.</p>	AEMO notes the response and has considered this feedback in its draft determination.
1	<p>Do you agree with the proposed changes to limit:</p>	Bluecurrent	<p>It is unclear what retrospect means in this context. Most metering related CR’s are submitted retrospectively. This is because it takes a number of days after a meter has been installed or reconfigured for</p>	AEMO notes the response and has considered this feedback in its draft determination.



No.	Question	Participant	Participant Comments	AEMO response
	<ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively If not, why?		the MP to perform QA tasks and for the MDP to raise CR's to establish/update Datastreams. For example, if we lose connectivity to an EN child meter the MDP will dispatch a field resources to investigate. Should the outcome be that the meter has been deenergised then the MDP will need to be to set the effective date retrospectively to the date communication were lost. Limiting the MDP to only prospective CR's will become a barrier to MDP's meeting their obligations. We do not agree until these issues are addressed.	
1	Do you agree with the proposed changes to limit: <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively If not, why?	SA Power Networks	No comment.	N/A
1	Do you agree with the proposed changes to limit: <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively If not, why?	Evoenergy	No comment	N/A
1	Do you agree with the proposed changes to limit: <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively If not, why?	Endeavour Energy	Yes, we agree with the proposed changes.	AEMO notes the respondents support for the change, however based on feedback from other participants, AEMO has modified the proposal.
1	Do you agree with the proposed changes to limit: <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively If not, why?	Ausgrid	With the future implementation of Flexible Trading Arrangements, Ausgrid believes that this issue should be further discussed with industry rather than a blanket rule. AEMO should audit ENMs for compliance and report any discrepancies to the AER.	AEMO notes the respondent's comment, AEMO will consider the FTA implications as part of it consultation in 2025.



No.	Question	Participant	Participant Comments	AEMO response
	<ul style="list-style-type: none"> the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>			
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	EnergyAustralia	EA would support this position of our EMN to ensure that they can still function and facilitate EN settlements as required for TENC.	AEMO notes the response.
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Intellihub	<p>We acknowledge the issue AEMO is looking to address is a valid concern, however we believe AEMO’s proposed solution has unintended impacts because it will:</p> <ol style="list-style-type: none"> Limit the ENM’s and MDP’s ability to perform error corrections, which usually is for an effective start date that is weeks or months in the past. Limit the ENM’s and MDP’s ability to perform Business As Usual obligations, which usually is for an effective start date that is days in the past. <p>We believe this unintended impact will not only impact the ENM’s and MDP’s ability to meet their obligations but also impact on AEMO’s settlement too because AEMO will not have all the metering data that AEMO should be getting.</p> <p>We suggest an industry focus group be scheduled where a deep dive of the root cause can be considered and various industry participants can collaborate on alternative solution options.</p> <p>Note, although the issues paper talks about Small Generation Aggregator (SGA) given they have been replaced with Small Resource Aggregator (SRA) since IESS started, I will be referencing SRA moving forward.</p> <p>A suggested option for consideration is to have a process whereby the NMI status for a SRA within an embedded network be managed by AEMO given that AEMO is responsible for the registration and deregistration of small generating units under a SRA and a SRA must settle all their registered generating units in the spot market.</p>	AEMO notes the response and has considered this feedback in its draft determination.



No.	Question	Participant	Participant Comments	AEMO response
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	CitiPower Powercor	CitiPower Powercor supports the proposed changes	AEMO notes the respondents support for the change, however based on feedback from other participants, AEMO has modified the proposal.
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	United Energy	United Energy supports the proposed changes	AEMO notes the respondents support for the change, however based on feedback from other participants, AEMO has modified the proposal.
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Energy Queensland	<p>Energy Queensland is of the view that, in general, the proposed changes would assist in managing the identified issues, however, we would appreciate further information on the investigations AEMO has completed in formulating the proposed changes. This would better allow participants to fully understand the issues, possible solutions and any flow on impacts to other participant activities.</p> <p>Of particular concern, is the lack of detail around where the change would apply and how it would be implemented. The current proposal appears to be a blanket ruling that no retrospective changes to NMI or data stream status will be allowed for an embedded/child connection point. We are of the view that there may be valid reasons that an Embedded Network Manager and a Metering Data Provider may be required</p>	AEMO notes the respondents support for the change, however based on feedback from other participants, AEMO has modified the proposal.



No.	Question	Participant	Participant Comments	AEMO response
			<p>to make retrospective changes to NMI or data stream status. For example, this could be the result of an error correction or updates resulting from information provided by other participants after agreements or changes have been made. Practically, most, if not all, these status changes are actioned retrospectively due to business and system process flows.</p> <p>We would appreciate further clarification from AEMO as to whether the proposed changes are intended to be restricted to specific NMI/Customer types (e.g. Small Generation Aggregators) but would not be applicable to other embedded connection points?</p>	
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	PlusES	<p>PLUS ES does not support the proposed changes as the approach is placing a blanket rule across all retrospective updates:</p> <ul style="list-style-type: none"> Current MSATS logic determines all changes are retrospective. The Embedded Network processes are likely to be manual, giving rise to 'legitimate' use cases where retrospective updates would be required. The proposed changes would extend to secondary settlement points (Unlocking CER Benefits). This rule change has not been finalised and the industry has not had the opportunity to understand the downstream implications. <p>PLUS ES recommends:</p> <ul style="list-style-type: none"> Further discussions are held with industry participants and options/impacts are explored. A report is developed to identify repetitive retrospective updating (criteria to define repetitive) and participants audited. AEMO considers removing this item from the current consultation and including it in the Unlocking CER Benefits associated AEMO consultations. This would also enable participants to further familiarise themselves with the rule changes, consider the 	AEMO notes the respondents support for the change, however based on feedback from participants, AEMO has modified the proposal.



No.	Question	Participant	Participant Comments	AEMO response
			upstream and downstream impacts and provide better informed feedback.	
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and de-activate NMI(s) retrospectively the ability of MDPs to activate and de-activate datastreams in embedded networks retrospectively <p>If not, why?</p>	Red & Lumo	<p>Red and Lumo suggest that a blanket ban on retrospective changes to NMI status or datastream is problematic because there are valid reasons why these may need to be retrospectively amended, however there is clearly a problem.</p> <p>Can the problem be addressed in another manner rather than removing the ability for retrospective changes?</p> <ul style="list-style-type: none"> - Identifying how this action is contrary to the best interests of the NEM or conflicts with obligations. - Identifying the participant or customer who initiates these changes in a manner that is contrary to the best interests of the NEM. 	AEMO notes the respondents support for the change, however based on feedback from other participants, AEMO has modified the proposal.
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and de-activate NMI(s) retrospectively the ability of MDPs to activate and de-activate datastreams in embedded networks retrospectively <p>If not, why?</p>	TasNetworks	<p>Although not directly impacted by this issue, TasNetworks considers that retrospective activation/deactivation of NMIs and datastreams may be required in the process of creation and removal of embedded networks for alignment with the parent NMI</p>	AEMO notes the respondents support for the change, based on feedback from other participants, AEMO has modified the proposal.
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and de-activate NMI(s) retrospectively the ability of MDPs to activate and de-activate datastreams in embedded networks retrospectively <p>If not, why?</p>	Alinta Energy	No preference recorded.	N/A