

# B2B/MSR Working Group

12 April 2024 Notes

Please note that this meeting is being recorded for note taking purposes







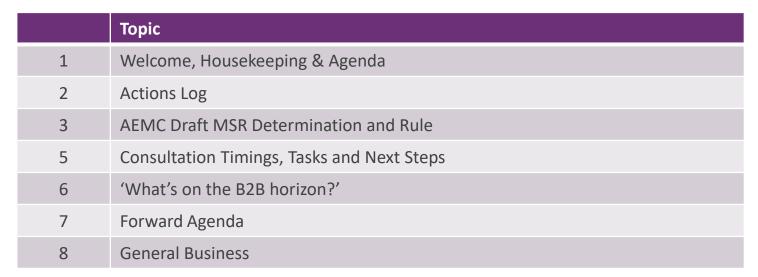
- 1. This meeting will be recorded for minute taking purposes
- 2. Please mute your microphone, this helps with audio quality as background noises distract from the conversation.
- 3. Use the 'Raise hand' function should you wish to speak to an item.
- 4. Use the 'Chat' function for any other questions or comments you may have.
- 5. In attending this meeting, you are expected to:
  - Not only represent your organisation's interests but also the interests of Industry and its customers
  - Have an open mindset
  - Contribute constructively
  - Be respectful, both on the call and in the chat



# AEMO Competition Law Meeting Protocol

- AEMO is committed to complying with all applicable laws, including the Competition and Consumer Act 2010 (CCA). In any dealings with AEMO, all participants agree to adhere to the CCA at all times and to comply with appropriate protocols where required to do so.
- AEMO has developed meeting protocols to support compliance with the CCA in working groups and other forums with energy stakeholders
- The AEMO Competition Law Meeting Protocol can be viewed and downloaded from AEMO's website









# Actions Log

Blaine Miner (AEMO)

# **Actions**



Action	Topic	Description	Status	Responsible	Comments
080224_01	ICF Register	AEMO to provide the B2B-WG detailed field, field length and enumeration analysis	Closed	AEMO	Analysis provided.
080224_02	ICF Register	B2B-WG to determined proposed field, field length and enumerations changes for consultation purposes	Closed	B2B-WG	Feedback received, predominantly supportive of AEMO recommendations
080224_05	ICF Register	The term 'non-regulated' to be defined in the B2B Procedures	Closed	B2B-WG	Draft term wording provided
140324_01	ICFs	<ul> <li>AEMO to send out a placeholder regarding a more holistic B2M and B2B May 2024 consultation workshop</li> <li>Members suggested a 4hr virtual meeting would be most appropriate</li> <li>Indictive timing: Early June (Thurs or Friday 6 or 7 June?), noting that submissions due date to the AEMC Draft is 30 May 2024, depending on IEC feedback and Industry Calendar availability</li> <li>Potential approach: By topic area instead of B2M vs B2B consultations. Each topic area would however consider B2M and B2B proposals as part of the workshop and attempt to demonstrate, where appropriate, as-is vs future state processes</li> </ul>	Open	AEMO	

## **Notes**

• Blaine Miner (AEMO) welcomed members to the meeting and spoke to the agenda and 'Actions Log' slide



# AEMC Draft MSR Determination and Rule

Blaine Miner (AEMO)

https://aemc.gov.au/rule-changes/accelerating-smart-meter-deployment

# Key Dates of the draft rules



Commencement Date	Description/Inclusions
25 July 2024	Electricity Rule: Schedule 3: This transitional schedule includes the Legacy Meter Replacement Plan framework and other provisions to enable the AER and AEMO to amend and publish, where they consider it necessary or desirable, procedures, guidelines and other documents to take into account the electricity rule.
	Retail Rule: Schedule 1: This schedule includes broader amendments to the NERR, including changes to customer notices, enabling small customers to request a meter for any reason and the removal of opt-out provisions.
By 30 September 2024	DNSPs would be required to provide a draft of their LMRPs to affected retailers and MCs, including a schedule specifying the legacy meters and corresponding National Meter Identifiers (NMIs) to be replaced in each interim period
22 January 2025	Electricity Rule: Schedule 1: This schedule includes amendments to the metering installation malfunction framework, including the Shared fusing replacement procedure, and the testing and inspection framework.
	The commencement date recognises the implementation work that stakeholders would need to complete to comply with the changes. It would also allow AEMO to implement any changes to its processes and systems in line with any amendments it has made to relevant documents.
By 31 January 2025	The DNSPs' LMRP proposals are due to be submitted to the AER
By 31 March 2025	AER would be required to approve the LMRPs
By 30 May 2025	AEMO would be required to review and update MSATS and any associated procedures to specify the information that must be recorded by a DNSP in relation to an approved LMRP
26 June 2025	Electricity Rule: Schedule 2: This schedule includes amendments to the rules regarding PQD.  The commencement date recognises the stakeholder implementation work required for the PQD changes and the benefits DNSPs, consumers and the broader energy market may obtain from PQD.
	Retail Rule: Schedule 2: This schedule includes amendments to the NERR to establish the Site defect notice procedure.  Retail Rule: Schedule 3: This transitional schedule includes amendments to implement the tariffs and charges safeguards.
By 29 June 2025	DNSPs must record the LMRP meter replacement schedules in the Market Settlements and Transfer Solutions (MSATS) system



Figure 1.1: The draft determination includes core and supporting reforms to the metering framework

#### Core reforms to deliver the benefits that smart meters offer

Accelerated deployment of smart

meters

- opens new possibilities for innovative products and services, expanding customers' control of and choices around their energy use
- · lower costs to customers of meter reads and installations
- · provides for a modern, data-enabled energy system
- · underpins the cost-effective decarbonisation of the energy market
- supports better integration of CER and a safer and more secure energy system.
- 2 Access to power quality data
- DNSPs can better manage their networks to reduce network costs for customers
- saves energy, minimises network safety risks, and lifts hosting capacity.

#### Supporting reforms to enable the core reform program

- 3 New customer safeguards
- protect customers from potential upfront charges and exit fees for new meters
- · builds social licence for the smart meter acceleration program.
- 4) Improving the customer experience
- helps maintain social license for the acceleration program
- ensures that customers can access the full suite of benefits that smart meters provide.
- 5) Reducing installation barriers
- supports delivery efficiencies, and therefore cost savings, in the accelerated deployment of smart meters.
- 6 Improved meter testing & inspections
- helps minimise costs for industry and customers
- supports a 2030 universal smart meter deployment target.

Source: AEMC

Figure 1.2: Some of the Review recommendations are not included in this rule change process

#### **Review recommendations** not captured within this draft determination

A Enabling access to real-time data

Support for

customer site

remediation

- empowers customer control and choice
- underpins innovation in products and services
- maximises the value of CER.
- potential regulatory change and customer financial support to remediate sites where necessary to enable a smart meter installation.

To be progressed through a separate rule change request.

To be considered by governments.

Source: AEMC



- Under the draft rule, new regulatory arrangements will require retailers and MCs to replace all existing Type 5 and Type 6 metering installations ('legacy' meters) with a Type 4 ('smart' meter) meter by 30 June 2030.
  - We acknowledge that there are barriers that may prevent a 100 per cent smart meter uptake by 2030 in practice. For example, site remediation may be a barrier to smart meter installations, with some customers being unwilling or unable to pay required remediation costs. Site remediation is currently the responsibility of the customer and beyond the scope of the energy laws and rules. A customer cannot be compelled to remediate their site.
- The draft rule would introduce a new regulatory mechanism where DNSPs work with retailers, MCs, and other stakeholders to develop an LMRP
  - Retailers and metering parties would have the option to replace meters ahead of the LMRP meter replacement schedules if they choose to.
  - DNSPs would be required to develop LMRPs in accordance with the 'LMRP objective'.
    - Box 2: LMRP objective
    - To require retailers and MCs to replace all existing Type 5 and Type 6 meters with a Type 4 meter by 30 June 2030, in a timely, cost-effective, fair, and safe way.
    - They would be published on the AER website, so that customers have visibility of the smart meter roll out, which enhances transparency and supports social licence.
  - These LMRPs would include:
    - An outline of the smart meter rollout profile. This would **show the postcodes or suburbs that would be scheduled for meter replacements in each** year from 2025 to 2030, and the total number of meters to be replaced in each year.
    - An explanation of how the LMRP objective and guiding principles have been applied (outlined further below), including supporting information and strategies that underpin the LMRPs.
    - A description of the DNSPs' consultation processes to develop the LMRPs, including who was consulted and how, what was learned through this consultation, and how the feedback shaped the plan.

Figure 3.1: Stakeholder roles in the LMRP process





### **Planning**

#### DNSPs:

Work collaboratively with retailers and other parties to develop plans (LMRPs) to meet the target.

#### Retailers:

Work with metering parties to undertake detailed planning and resourcing.

Communicate with customers about their upcoming smart meter upgrade.

### Delivery

### Metering coordinators:

Install smart meters for customers.



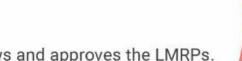
#### AER:

Reviews and approves the LMRPs.

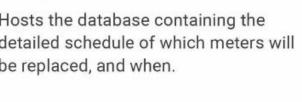
Undertakes performance reporting, compliance, and enforcement.

#### AEMO:

Hosts the database containing the detailed schedule of which meters will be replaced, and when.



**ENABLING** 



Source: AEMC



- Box 3: LMRP principles
  - 1. Approximately 15–25 per cent of legacy meters should be planned for replacement in each interim period. An interim period is each financial year in the acceleration period, from 2025–2030. This principle provides clear guidance for DNSPs and affected parties when developing LMRPs, and ensures the replacement program is not back-ended. This would mitigate the risk that retailers do not have enough time to address unforeseen issues by the 2030 target.
  - 2. DNSPs should have regard to the overall efficiency of the LMRP, including costs and potential cost savings for affected market participants. **DNSPs** should consider grouping installations by postcodes, zone substations, and/or meter reading routes to support coordination and delivery efficiencies.
  - 3. DNSPs should have regard to the impact of LMRPs on retailers and other affected stakeholders. **DNSPs would be required to consult with key stakeholders, identify relevant concerns with the draft LMRP, and address those concerns in the LMRP proposal to the AER**. Stakeholders are expected to help shape the replacement profile to ensure it is achievable.
  - 4. DNSPs should have regard to appropriate and efficient workforce planning, including in regional areas. **DNSPs would be required to consider how the parties will utilise local work forces in a way that avoids moving installers every year or creating a local boom-bust cycle.** Considering labour market conditions for electricians and the supply of metering components in the LMRPs would help retailers meet their obligations.
- By no later than 30 September 2024, and prior to submitting their LMRP proposals to the AER, DNSPs would be required to:
  - provide a draft of their LMRPs to affected retailers and MCs
  - provide a schedule specifying the legacy meters and corresponding National Meter Identifiers (NMIs) to be replaced in each interim period under the LMRP (the LMRP meter replacement schedule) to retailers and MCs only
  - invite feedback on the draft LMRP from affected stakeholders.



- The DNSPs' LMRP proposals are due to be submitted to the AER by 31 January 2025.
  - To strengthen the consultation requirements, DNSPs would be required to demonstrate to the AER that they have met these requirements by including in the LMRP proposal:
    - an explanation of how the LMRP is consistent with the LMRP objective and principles
    - a description of how retailers, metering parties and other relevant and affected stakeholder were engaged in developing the proposal, relevant concerns raised through that engagement, and how those concerns have been addressed.
- Under the draft rule the AER would have a light-touch oversight role
  - Following DNSPs' submission of LMRP proposals to the AER by 31 January 2025 (as noted above), the **AER would be required to approve the LMRPs no later than 31 March 2025.** This would allow the acceleration program to commence 1 July 2025.
  - The AER would not be required to assess the merits of each DNSP's LMRP.
  - The AER would approve an LMRP if it is satisfied that the LMRP complies with the LMRP requirements.
  - Following approval, the AER would publish the LMRP on its website.
- The draft rule would require DNSPs to communicate the LMRP meter replacement schedules to retailers
  - Under the draft rule, DNSPs would communicate to retailers the schedule of meters that they must replace under the LMRP. DNSPs would communicate this information in accordance with the steps outlined below:
    - 1. During consultation on the draft LMRP, DNSPs must provide the LMRP meter replacement schedules to relevant stakeholders (who are allowed to access NMI standing data). We expect DNSPs to consult on how these meter replacement schedules will be provided. This information should be communicated in a consistent, standardised, and accessible format, preferably in the same format across all DNSPs.
    - 2. Following AER approval of the LMRPs, DNSPs must provide meter replacement schedules to relevant stakeholders, including AEMO.
    - 3. By no later than 29 June 2025, DNSPs must record the LMRP meter replacement schedules in the Market Settlements and Transfer Solutions (MSATS) system, in accordance with relevant procedures.



- The MSATS information noted above in step 3 would be available throughout the duration of the acceleration program. To enable this, by 30
  May 2025, AEMO would be required to review and update MSATS and any associated procedures to specify the information that must be
  recorded by a DNSP in relation to an approved LMRP. We understand it is practically very difficult for this to occur sooner than May 2025.
- The Commission considers that using MSATS to communicate LMRP meter replacement schedule information would minimise regulatory burden on industry. This approach leverages an existing system that can:
  - be updated as frequently as needed
  - provide real-time information to relevant market participants
  - act as a 'single source of truth' regarding meter replacement schedules, housed in an environment that is already visible to all relevant parties whenever they need to see it.
- Alternatives, such as DNSPs regularly issuing updates to relevant stakeholders via email or other means, would likely be more burdensome and costly, requiring regular manual handling.
- A further benefit of using MSATS to communicate this information is that it helps to manage the impacts to the rollout of customer 'churn' between retailers. Without a seamless and low-cost way of updating LMRPs to reflect churn near to real-time, they would become progressively inaccurate over the duration of the five-year deployment period.
- Using MSATS, retailers and MCs would have on-demand access to any updates to their replacement requirements in near real-time. This requirement also supports the AER's annual performance reporting and compliance considerations providing accurate interim target information that retailers must report against.



- Under the draft rule, retailers would be responsible for implementing the LMRPs, by arranging for meters to be upgraded in line with the schedules developed by the DNSPs. Retailers would appoint MCs, who would in turn visit customer sites to install smart meters.
- Retailers would also be responsible for communicating with customers ahead of their meter upgrade, and providing them with important information regarding their smart meter. This is outlined in further detail later in this chapter.
- The LMRPs would include yearly interim targets that retailers must make best endeavours to meet, and a final target of universal penetration by 2030. Retailers would be required to report on their annual performance to the AER. This is also outlined in further detail later in this chapter.
- Over the five-year accelerated deployment period, there may be unforeseen circumstances that impact a retailer's ability to deliver meter installations in accordance with the LMRP. This might include circumstances such as unforeseeable field resource or meter equipment supply constraints, natural disasters, or other weather events.
- The draft rule includes a process that would allow retailers to apply for amendments to the schedule of meters retired over the acceleration period, supporting the need to flexibly respond to unforeseen issues.
- To trigger this process, a retailer would put forward an amended version of the LMRP for the relevant DNSP's consideration. The DNSP may agree to amend an LMRP if it appears to the DNSP that the plan is affected by a material error, material change of circumstances, or 'event'.

  The relevant DNSP and the AER must then re-apply the LMRP process (as outlined above).

# Performance reporting and compliance obligations



- The draft rule would introduce performance reporting and compliance obligations
- Reporting and compliance obligations will support the acceleration program Performance reporting obligations would promote transparency and accountability
- Requiring retailers and metering parties to **report on their performance against meeting the interim targets and 2030 goal** would promote transparency and accountability, and support the timely deployment of smart meters. Performance reporting would also incentivise performance improvement and support the AER in its compliance monitoring and enforcement activities.
- The AER may seek further information from retailers if, for example, a retailer's performance is an outlier and there are questions about the retailer's efforts to address customer concerns. This would create stronger incentives for retailers to address any issues preventing smart meter installation. Retailers could provide the AER with additional context if they are not meeting the interim targets, and assurance that they are on track to ultimately meet the 2030 target.
- Civil penalties would help incentivise achievement of the 2030 target
- We consider that financial incentives for retailers to meet the 2030 target are appropriate to support the timely deployment of smart meters. We also consider that such penalties are proportionate to the negative impact on consumers if retailers do not meet their final targets.
- We do not consider such penalties are necessary for interim targets. Reputational and other incentives created by performance reporting, as well as the final 2030 target, provide sufficient incentives for retailers to meet interim targets.

# Performance reporting and compliance obligations



- The draft rule would introduce new performance reporting and compliance obligations for retailers, and a monitoring and enforcement role for the AER
- The draft rule would require retailers to report against their performance Under the draft rule, retailers would be required to report on their performance to the AER. This would be done under the current framework for retail market performance reports. The AER's annual reports would cover the previous financial year and are due to be published on or before 30 November each year.
- Specifically, retailers would be required to report on their high-level performance against their LMRP meter replacement schedules. These
  indicators or metrics are outlined in the draft rule. Retailers would be required to explain their performance against the interim and final
  targets, and outline their plan to get back into compliance (if necessary).
- The **AER must report on the retailers' performance annually** under the draft rule, including retailers compliance with the interim and final targets and progress against the LMRP objective. The AER may provide commentary on the reasons for any material differences between retailer results. The AER may seek further information from the retailers if, for example, a retailer's performance is an outlier, and it appears to be non-compliant.
- The draft rule would **introduce new civil penalties for non-compliance with the 2030 target** Civil penalties would apply to retailers for non-compliance with the final 2030 target, but not the interim targets.
- Where a legacy meter has been scheduled for replacement in an LMRP, the retailer must:
  - use best endeavours to ensure it is replaced in accordance with the LMRP meter replacement schedule to meet the interim targets
  - meet the final target of universal penetration of smart meters by 2030 subject to the retailer being able to justify any failure to meet the target, based on a reasonable assessment of the circumstances.

# Performance reporting and compliance obligations



- If a retailer is unable to replace a meter in accordance with the LMRP, or the meter is not functioning as required, it will be open to the retailer to report the reasons to the AER.
- Where a small customer switches retailers during the final interim period (1 July 2029 30 June 2030), but before they receive a smart meter upgrade, the incoming retailer must ensure the legacy meter is replaced by the later of 30 June 2030, or six months after the small customer switches retailers.

## Power Quality Data (PQD)



- The draft rule would give DNSPs better access to 'basic' PQD to unlock a range of benefits for stakeholders
- Access to 'basic' PQD benefits DNSPs, consumers, and the broader energy system PQD refers to the characteristics of the power supply as measured by the meter. We consider 'basic' PQD to **include measurements of voltage, current, and power factor**. We consider 'advanced' PQD to include measurements in addition to those identified for 'basic' PQD.
- For DNSPs, access to information about the customer's electrical power supply will be increasingly important for the operation of the distribution system. Giving DNSPs better access to 'basic' PQD supports their understanding of the network, and allows DNSPs to:
  - save energy by maximising CER hosting capacity
  - reduce line losses
  - minimise safety risks, such as through earlier detection of neutral integrity faults and voltage excursions at customer premises
  - drive down costs within the distribution network by extracting the most value from the existing distribution network assets and
    optimising future investment decisions.
- The proposed changes to the 'basic' PQD access and exchange arrangements would also promote better outcomes for consumers and the broader energy system by:
  - improving standardisation in the structure, types, sequencing, and frequency of 'basic' PQD provided across market participants
  - reducing differences in exchange architectures or methods for 'basic' PQD access
  - addressing a potential lack of competitive pricing where 'basic' PQD is required from a high percentage of sites.

## Power Quality Data (PQD)



- The draft rule would provide DNSPs with better 'basic' PQD access
- DNSPs require access to 'basic' PQD to efficiently operate the distribution system. The Review identified several DNSP use cases that 'basic' PQD enables, such as detecting neutral integrity issues and energy and meter theft. Most of the use cases identified also need 'basic' PQD from a large portion of meters.
- Under current arrangements, metering parties hold and control access to PQD generally, and DNSPs can only receive PQD through commercial negotiation with metering parties. This means that metering parties can charge DNSPs prices well above the marginal cost to receive PQD. In these circumstances, DNSPs can have limited bargaining power to negotiate efficient prices for access to 'basic' PQD, leaving them as price-takers. This outcome can lead to higher than necessary costs for DNSPs for access to the data, which are ultimately passed onto customers.
- The draft rule would introduce new arrangements to the metering framework to provide DNSPs access to 'basic' PQD from small customer meters on an ongoing basis, without undue delay or direct charge. This framework whereby 'basic' PQD is provided free of direct cost and access to 'advanced' PQD is negotiated on a commercial basis, is consistent with the approach from the Review, of which stakeholders were supportive.
- The flexible design of the arrangements would allow AEMO to enable a 'basic' PQD service with a standardised exchange architecture and appropriate service levels. AEMO would enable the architecture and service levels through its processes and procedures (see section 3.2.2).
- The new arrangements would:
  - Establish a definition of 'basic' PQD, which provides the characteristics for 'basic' PQD. At a minimum this would include measurements of voltage (in volts), current (in amperes), and power factor (expressed as the ratio of the active power kW to the apparent power kVA or as a phase angle).
  - Impose responsibilities, requirements, and exemptions on MCs and MDPs to give local DNSPs better access to 'basic' PQD.
  - Incorporate the term PQD into the definition of 'metering data services' so that obligations on MDPs to provide metering data services applies to 'basic' PQD to the extent necessary, which includes the validation and substitution of power quality data. Consequently, new accreditation maybe required.
  - Allow local DNSPs to access or receive 'basic' PQD.
  - The draft rule would make consequential amendments to support these arrangements, such as: refining the requirements on MCs, MDPs, and AEMO, clarifying the information to be included in AEMO's metrology and service level procedures defining the confidential nature of 'basic' PQD.

## Power Quality Data (PQD)



- Additional work is required to implement the 'basic' PQD arrangements
- AEMO will lead work to implement the 'basic' PQD service and determine the exchange framework and service levels for 'basic' PQD.
   Implementation would involve updates to AEMO's processes and procedures, which would be conducted in consultation with stakeholders.
- We consider that AEMO should leverage the existing framework to align the delivery, operation, and conformance management of 'basic'
  PQD to that of the existing metering data delivery service. To achieve this, AEMO should consider the findings and principles from the
  Review.
- We recommend a new civil penalty to support 'basic' PQD compliance
- We recommend a new civil penalty for instances where MDPs do not provide 'basic' PQD to DNSPs or share 'basic' PQD with unauthorised third parties. The penalty would:
  - 1. Protect consumer data. 'Basic' PQD is data provided by consumers and becomes identifiable consumer data when provided with the customer's NMI. The penalty would deter unauthorised disclosure of 'basic' PQD to third parties.
  - 2. Encourage MDPs to comply with their obligation to provide 'basic' PQD to DNSPs. Under the proposed 'basic' PQD arrangements, MDPs would give 'basic' PQD to DNSPs free of direct charge. The penalty would incentivise MDPs to comply with their obligation, noting that there may not be enough of a financial incentive for them to comply otherwise.
  - 3. Align with the civil penalty requiring MDPs to provide metering data and relevant NMI Standing Data to certain persons only. We consider this penalty necessary to successfully implement the new 'basic' PQD arrangements.

## Customer safeguards



- The draft rules:
  - prohibit retailers from charging small customers any upfront costs or exit fees that relate to replacing a type 5 or 6 metering installation identified in an LMRP (this prohibition does not apply to new connections, or meter replacements initiated at the customer's request)
  - require retailers to provide their customers at least 30 business days' notice when transitioning them to a different pricing structure during the LMRP period as a result of a change in meter type, as well as information on how to understand and manage the change.
- Prohibiting upfront charges would mitigate social licence risks
- The draft rule would prohibit any upfront charges or exit fees for the replacement of a legacy meter during the LMRP period
- The draft rule would enhance notification requirements ahead of any changes to retail pricing structures
  - The retailer must issue a notice at least 30 business days before any variation in the tariff is applied to the customer. This 30-business day notification period would apply to changes to retailer pricing structures (for example, a time-of-use tariff), as distinct from pricing levels (for example, prices going up or down due to changes in wholesale prices). This safeguard would not apply for a change to a retail customer's pricing structure that is not related to their meter replacement, or that happens outside of the LMRP period.
    - The retailer must specify that the customer can request an estimate of what their historical bill would have been under the varied tariff compared to the bill they received under the existing tariff (to the extent that the customer's smart meter data is available).
    - The retailer must provide supporting (generic) information to the customer on how to:
      - understand and monitor their usage (such as apps, web portals, or in-home displays)
      - manage their usage to be rewarded for responding to price signals under the new tariff structure (such as ways to shift consumption).
  - These safeguards would apply during the LMRP period for any tariff changes that have resulted from a change in meter type, and would cease to apply from 31 December 2030.

# Improving the customer experience in metering upgrades



- Supporting a positive customer experience in the acceleration program helps maintain social licence for the reforms and ensures that customers can access the full suite of benefits that smart meters provide.
- The draft rule would:
  - expand the smart meter information retailers must provide to customers prior to any upgrades
  - enable customers to request a smart meter from their retailer for any reason, and require retailers to install a smart meter on receipt of such a request
  - improve the meter malfunctions replacement framework by:
  - setting different timelines of 15 business days for individual meter malfunctions and 70 business days for family failure malfunctions identified through sample testing
  - improving the malfunctions exemptions process currently administered by AEMO, in its application to small customer metering installations.
- The draft rule would require retailers to provide customers with a retailer information notice no more than 60 business days and no fewer than four business days before a proposed metering installation date. The notice would be issued to customers via their preferred method of communication.
- The notice would include the information in Box 8, some of which is already required under the current rules. Retailers would not be required to include customer-specific or bespoke information. Most of the information should apply to the retailer's broad customer base.
- Retailers would issue the notice before all types of smart meter deployments, other than new connections. For example, customers who request a meter upgrade outside of the scheduled accelerated deployment program would receive a notice.

# Improving the customer experience in metering upgrades



- Box 8: Information that retailers must include in their notice to customers
  - The reasons for the proposed meter deployment (for example, meter failure, customer request, or new meter deployment as defined in the NERR, rule 3).
  - An indicative timeline for when the customer would receive the smart meter (this can be a date range).
  - How the customer can access their smart meter data.
  - The customer's rights and responsibilities regarding the meter installation (including remediation work).
  - Any upfront charges the customer will incur under their retail contract as a result of the new meter deployment.
  - Any changes to the consumer's retail contract resulting from the meter installation, including tariff changes (if applicable).
  - A summary of the services available to the customer as a result of obtaining a smart meter (including how customers can benefit from smart meters).
  - Who the customer should contact to resolve issues, including dispute resolution options.
  - The retailer's contact details.
  - Contact details of interpreter services in community languages.
- The draft rule would require retailers to install a smart meter for customers upon request
  - Under the current NERR, there is no explicit direction to retailers to install a smart meter for customer requests not associated with a connection upgrade or a solar PV installation.
  - The draft rule would give customers the right to request and receive a smart meter for any reason, including where they have a functioning meter or do not have CER. Retailers would be required to fulfill any customer-initiated request within the existing installation timeline requirements in the NER. This means that retailers would not be able to defer a customer-requested smart meter installation to the meter's scheduled replacement date under the LMRP if this is later than the installation timeline requirements under the NER.

## A better malfunctioning meter framework



- The draft rule would make a distinction between different types of malfunctions and makes changes to the malfunctions exemption process
- Under the draft rule, there would be two separately defined categories of meter malfunctions, with different replacement timeframes.
- Under the draft rule, there would be two separately defined categories of meter malfunctions, with different replacement timeframes.
  - Individually identified (individual failures) 15 business days
  - Identified through statistical testing (family failures) 70 business days
- This differs from current arrangements where all types of malfunctioning meters must be replaced within 15 business days, or within 30 business days if the meter replacement involves interruption supply to another customer (a shared fuse arrangement). Under the draft determination, if an MC finds that a malfunctioning meter is on a shared fuse, the MC would follow the process and timelines outlined in the proposed Shared Fusing Meter Replacement Procedure (per section 3.5.3).
- The draft determination would create a more clearly defined exemption process to support more timely replacements. When applying for an exemption, MCs would be required to provide AEMO with a rectification plan for malfunctions. The draft rule would also likely require AEMO to make changes to its procedure for malfunction exemptions. When updating its procedures, we expect AEMO to consider the size of any family failure (where applicable), as well as whether any previous exemption have been granted.
- The draft determination would clarify that MCs must still replace malfunctioning meters in accordance with time frame requirements under the NER, and not defer replacements to scheduled time frames under any LMRP.



- Reducing barriers and improving industry coordination will support delivery efficiencies, and therefore cost savings, in the accelerated deployment of smart meters.
- The draft rule would:
  - remove the option for customers to opt-out of a new meter deployment (as defined in the NERR, rule 3)
  - reduce the number of notices that retailers send to customers before a new meter deployment from two to one
  - establish a process for DNSPs, retailers and metering parties to install meters in shared fusing scenarios, such as multi-occupancy sites
  - enable a process for retailers to encourage customers to remediate, as well as to track customer site defects.
- A coordinated approach to shared fuse upgrades would be more efficient and improve the customer experience. Specifically, a more coordinated approach would:
  - enable multiple meter replacements simultaneously, supporting the acceleration program
  - reduce the number of interruptions of supply for a group of customers on a shared fuse (a Temporary Isolation of Group Supply (TIGS))
  - reduce delays in meter replacement and the number of site visits required by metering providers (MPs) and DNSPs
  - minimise the costs of meter replacement by reducing the need for multiple MP and DNSP visits.
- Under the draft rule's proposed Procedure, a metering upgrade for one or more customers on a shared fuse would trigger the upgrade for all customers a 'one in all in' approach under which all meters on the shared fuse are upgraded at the same time. The Procedure would be an ongoing provision and apply to all sites that do not have defects, site access issues, or site safety issues preventing installation.



- There are five key steps under the Procedure
- 1. Discovery of shared fusing: An MP discovers meters on a shared fuse. When this happens it must contact the retailer that authorised the site visit and trigger the Procedure. These metering parties are referred to as the 'Original MC' under the Procedure.
- 2. Raising a temporary isolation request: Within five business days the retailer must inform the DNSP of the shared fuse and raise a request for a TIGS, as per current arrangements.
- 3. DNSP visit and notification to retailers: Within 20 business days of being notified by the retailer, the DNSP must:
  - a. Visit the site and identify all affected NMIs on the shared fuse
  - b. Set a date and time for a supply outage. In setting the duration of the outage, the DNSP should consider the length of time reasonably required to install the new meters
  - c. Issue a notice to the retailers of the respective NMIs. The notice must include:
    - i. the details of the Original MC, which enables the retailer to appoint them as their MC for the site, should the retailer wish to do so
    - ii. the date and time of the scheduled outage, which must be between 25 and 45 business days after the notice is issued.
- 4. Appointment of MCs: Within 10 business days of receiving a notification from the DNSP, retailers must appoint an MC (the Original MC or one of their choosing) and raise a service order for meter replacement(s). The date specified in the service order request must align with the date for the scheduled outage specified in the DNSP's notification.
- **5. Meter replacement:** On the date and time prescribed in the notice and service order request, the DNSP undertakes the outage and the metering party or parties visit the site and installs the new meters.
- The AEMC expects that the AER would allocate the cost of TIGS across impacted retailers on a pro-rata basis



- The draft rule would encourage site remediation and enable better tracking of site defects
- There are currently no clearly defined processes that market participants must follow when a meter upgrade is not possible due to a site defect.
- The draft rule would establish a customer notification and industry record-keeping process, which would be triggered when an MP encounters a defect on a site visit. The process would be a new provision in the NERR and an ongoing arrangement beyond the acceleration period. It would also apply to all types of meter deployments.
- MCs would identify and be responsible for recording site defects and retailers would be responsible for notifying customers
- 1. The MP discovers a defect with a site:
  - The MP must leave a defect notice with a customer outlining the site defect preventing a metering upgrade.
  - The MC must:
    - notify the retailer of the site defect
    - record the defect in MSATS to minimise future wasted site visits (Note: does not specify the 'type' of defect)
  - Within five business days of being notified of a site defect, the retailer must:
    - send a notice to the customer informing them of the site defect and requesting the customer remediate the site in preparation for a smart meter installation
    - record the date the first notice is issued in MSATS.



- 2. If the retailer has not received confirmation from the customer that the site defect has been rectified within 40 business days of issuing the first notice:
  - The retailer must:
    - send a follow-up notice to the customer no less than 40 business days and no more than 45 business days after issuing the first notice to the customer
    - record the date the second notice is issued in MSATS.
  - For cases where the customer switches retailers, recording the notice issue dates would inform the incoming retailer of the remaining steps in the process and their obligations.
- 3. The retailer must then use reasonable endeavours to confirm with the customer whether the site defect has been rectified within 40 business days of issuing the second notice:
  - The retailer must:
    - use reasonable endeavours to confirm with the customer whether the site has been rectified
    - record the status of site remediation (successful or unsuccessful) in MSATS.
- If the customer remediates their site and notifies the retailer, the retailer must progress the upgrade and replace the meter within the relevant timeframe under the NER.
- If the customer confirms with the retailer the site defect has not been rectified, or if the retailer is not able to contact the customer, the retailer is not required to install the meter until they are notified that the site defect has been rectified. The draft rule would require that the MSATS Procedures include the site defect information requirements above.
- Where a customer changes their retailer part-way through the notification process, the incoming retailer would be required to complete the remaining steps of the two-stage notification process. This limits duplicate notices and supports a better customer experience.

# Fit-for-purpose testing and inspection regime



- A fit for purpose meter testing and inspection framework will help minimise metering costs for industry and consumers and support a 2030 universal accelerated deployment target.
- The draft rule:
  - exempts MCs from testing and inspecting legacy meters during the LMRP period.
  - clarifies the testing and inspection requirements for meters by:
  - refining how the testing requirements apply
  - requiring MCs to inspect smart meters in line with an asset management strategy (AMS) approved by AEMO
  - requiring AEMO to develop, maintain, and publish guidelines on the AMS submission and approval process within six months of the final rule being made.
- The draft rule would temporarily exempt MCs from testing and inspecting legacy meters
- Under current arrangements, Schedule 7.6 of the NER sets out the default level of testing and inspection for each meter category in terms of a maximum period between tests and inspections.
- MCs can also outline an alternative testing and inspecting practice for meters in an AMS, subject to AEMO's approval.
- The draft rule would exempt MCs from testing and inspecting legacy meters during the LMRP period. The testing and inspection requirements for legacy meters would re-apply after the LMRP period ends.
- The draft rule would clarify testing requirements and require MCs to inspect meters in line with an approved AMS
  - The draft rule would clarify that these testing requirements only apply to the testing, and not inspection, of meters.
- The draft rule would require AEMO to develop, maintain, and publish new AMS guidelines

# Fit-for-purpose testing and inspection regime



- The draft rule would introduce a testing and inspection objective and associated principles
- To support AEMO in developing the AMS guidelines, the draft rule would introduce a testing and inspection objective and associated high-level principles.
- A clear objective would reduce ambiguity in the testing and inspection requirements by making it easier to discern whether a testing and inspection strategy meets the intent of Schedule 7.6.
- Currently, the NER only provides a list of checks that inspection 'may include'.
- High-level principles would demonstrate how the AMS guidelines promote efficiency and allow flexibility and innovation in testing and inspection practices. The principles could also address MCs' concerns about overly specific testing and inspection requirements, which hinder metering competition.
- The draft rule would also define key terms such as AMS, AMS guidelines, legacy meter, and LMRP which are necessary to support the operation of the testing and inspection amendments.

## **Draft Rule Items of Interest**



- 11.[XXX].11 Amendments to Market Settlement and Transfer Solution Procedures
- (a) By no later than 30 May 2025, and in accordance with the Rules consultation procedures, AEMO must review and amend the Market Settlement and Transfer Solution Procedures to specify:
  - (1) 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, and details of which parties may access that data, which must be restricted to the financially responsible Market Participant;
  - (2) the information that must be recorded by an Affected Retailer when it has issued notices under rule 59AAA(b) and (c) of the NERR; and
  - (3) the information that must be recorded by a Local Network Service Provider in relation to an approved LMRP.
- (b) After 31 December 2030, AEMO may amend the Market Settlement and Transfer Solution Procedures to remove the information outlined in subparagraph (a)(3).

### **Notes**

- Blaine Miner (AEMO) spoke to the 'AEMC Draft MSR Determination and Rule' slides
- Members discussed several matters which will be considered in more detail at the face-to-face meeting in Melbourne on the 22/23 April 2024, including:
  - The AEMC not adopting Industry/MSR-WG feedback in the Draft
  - The short turnaround between Draft submissions closing and the final rule being published, only 6wks
  - The potential consequence of PQD coming into effect from 26 June 2025 and shared fusing from 22 Jan 2025
  - The draft rule being silent on MCs having access to NMI standing data
  - The exclusion of 'Defect Types' between the Final Report and the Draft Rule
  - The suggested percentage bands for the LMRP interim targets
  - The requirement to provide a minimum of 4-days' notice to customers prior to replacing a meter
  - The inability for Retailers to 'turn off' one of the 2 existing customer notifications for a new meter deployment from 25 July this year and the transition associated to this draft obligation
  - The preferred format of the LMRP field in MSATS
  - Defect notifications and customer remediation supporting various Retailer and customer churn scenarios
  - Activities supporting the 'one-in-all-in' process
- Members mentioned the importance of reading the AEMC's draft determination and draft rule in tandem, misinterpretations are more likely to occur by reading one component in isolation



# Consultation Timings, Tasks and Next Steps

Blaine Miner (AEMO)



AEMO

(as of 5 April 2024)

Consultation steps	Indicative Dates	Business Day Allowance
AEMC Consultation Initiation	Thursday, 14 March 2024	
AEMC Draft Determination	Thursday, 4 April 2024	
IEC Consultation Initial Notice	Wednesday, 29 May 2024	
<b>AEMC Draft Determination Submissions Close</b>	Thursday, 30 May 2024	
AEMC Final Determination	Thursday, 11 July 2024	
IEC First Stage Submissions Close	Thursday, 11 July 2024	30
IEC Draft Determination	Thursday, 12 September 2024	45
IEC Draft Determination Submissions Close	Friday, 11 October 2024	20
IEC Final Determination	Friday, 22 November 2024	30





(as of 5 April 2024)

Task	Responsibility	Support	Dependencies	Indicative End Date
B2B/MSR-WG	B2B/MSR-WG	AEMO	AEMC Draft Determination and Rule	Tues/Wed, 23-24 April 2024
Circulate final recommendations to the IEC	B2B-WG	AEMO	AEMC Draft Determination and Rule	Friday, 26 April 2024
Receive IEC feedback	IEC	IEC Secretariat	B2B-WG recommendations	Wednesday, 1 May 2024
Prepare Consultation documents				
Prepare Issues Paper	AEMO	B2B-WG	IEC endorsed positions	Friday, 3 May 2024
Prepare Track change procedures	B2B-WG		IEC endorsed positions	Friday, 3 May 2024
Prepare Notice of First Stage Consultation	AEMO		IEC endorsed positions	Friday, 3 May 2024
Prepare Response Tables	AEMO		IEC endorsed positions	Friday, 3 May 2024
Review Consultation documents				
B2B-WG	B2B-WG	AEMO	Draft Change Pack	Friday, 10 May 2024
AEMO and Legal	AEMO	B2B-WG	B2B-WG reviewed Change Pack	Friday, 17 May 2024
Approve Consultation documents	IEC	B2B-WG	Completed Change Pack	Friday, 24 May 2024
Publish Consultation documents	AEMO		IEC approved Change Pack	Wednesday, 29 May 2024
Send out Stakeholder Notices	AEMO		IEC approved Change Pack	Wednesday, 29 May 2024





- Progress AEMO and IEC consultation documents, including change marked procedures where possible
  - Identified B2B Issue Paper gaps: Assessment of B2B Principles, B2B Factors, Benefits and Costs
- B2B/MSR-WG face-to-face meeting scheduled for Tues/Wed (23-24) April 2024 in Melbourne
  - The face-to-face is to start at 9am local time on Tues 23 April and end at 2pm local time on Wed 24 April
  - Confirm objectives and outputs from the workshop
    - IEC B2B Recommendations and Change Pack
    - AEMO B2M Recommendations
    - · Other?
- B2B-WG to circulate its consultation recommendations to the IEC via circular by Friday, 26 April 2024
- IEC feedback received by Wednesday, 1 May 2024
- B2B-WG to complete the required Change Pack, and circulate to the IEC for approval, by Friday, 17 May 2024
- IEC to approve the proposed Change Pack for publishing by Friday, 24 May 2024
- AEMO to publish the Change Pack by Wednesday, 29 May 2024

- Blaine Miner (AEMO) spoke to the 'Consultation Timings, Tasks and Next Steps' slides
- David Woods (SAPN) mentioned that the AEMC has requested to meet with the MSR-WG to answer questions and provide additional context regarding its Draft determination
  - Members were supportive of having an opportunity to meet with the AEMC as part of its face-to-face meeting on 22/23 April 2024
- Members are still considering the optimal balance between providing stakeholders adequate time to respond to consultation stages whilst maximising the allowable time between finalising the procedures and participant obligation commencement dates
- Blaine mentioned that due to the potential for material changes between the Draft and Final Rules, including change marked procedures in the initial stage of the B2M consultation may not be advisable
- Blaine mentioned that further discussions associated to PQD are scheduled for Day 2 (23 April 2024) of the face-to-face meeting in Melbourne
- Adrian Honey (TasNetworks) mentioned that additional/different Participant resources may be required to support technical aspects associated to considering PQD
- Blaine mentioned that AEMO is intending to run an MSR High-level implementation design (HLID) industry session in mid-May
  - Members suggested that AEMO should:
    - Seek to provide key dates associated to AEMO's implementation e.g. MSATS Technical specifications
    - Leverage and callout the engagement and thinking which has occurred over the last 6mths through the MSR-WG
- Consultation preparation will continue over the coming weeks, including drafting the Issue Papers and change marked procedures
  - Note, the B2B Guide to not be included in the initial stage but instead be introduced at a later stage of the IEC consultation



### 'What's on the B2B horizon?'

Blaine Miner (AEMO)

## 'What's coming on the horizon'

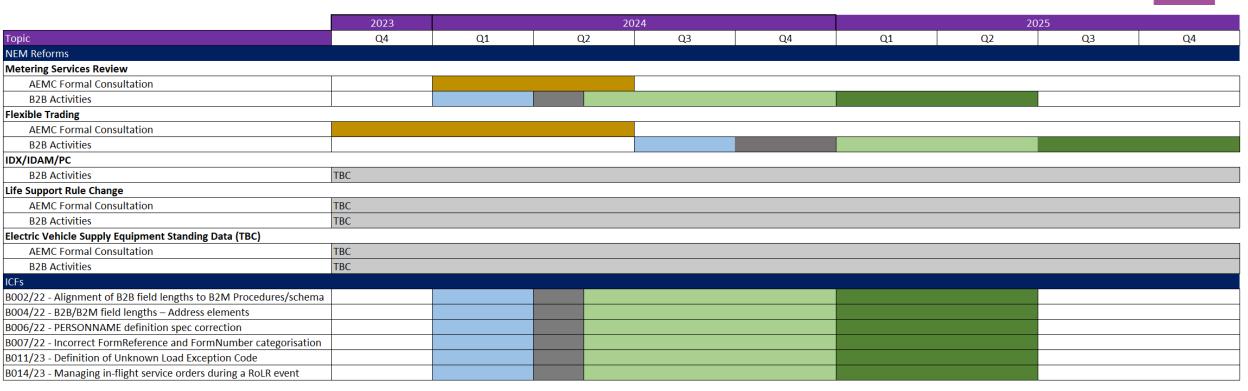


Topic	Timing	Next Milestone	Comments	
Review of the regulatory framework for metering services	Immediate	AEMC Draft Report and Rule	https://aemc.gov.au/rule-changes/accelerating-smart-meter- deployment	
Unlocking CER benefits through Flexible Trading	Immediate	AEMC Draft Report and Rule	<ul> <li>https://www.aemc.gov.au/rule-changes/unlocking-CER-benefits-through-flexible-trading</li> <li>Indicative Consultation Timings:         <ul> <li>Stakeholder submissions due 11 April 2024</li> <li>Final determination and rule July 2024</li> <li>Proposed implementation date 2 February 2026</li> </ul> </li> </ul>	
Potential Life Support Rule Change	Short/Medium term	Stakeholder meeting scheduled for 22 April 2024	#BetterTogether Life Support Customers Initiative - The Energy Charter	
IDX, IDAM and PC	Medium Term			
Electric Vehicle Supply Equipment Standing Data	Medium/ Longer term	Current Reform Status –  'Rules Development' Q1 to Q4  2024  (As per V3 of the NEM Reform  Roadmap)	<ul> <li>The ESB is seeking stakeholder feedback on the rationale and options for capturing 'standing data' for new EVSE installations presented within the consultation paper.</li> <li>Ensure that agencies and market participants have sufficient visibility of emerging electric vehicle supply equipment (EVSE) for effective planning and management of the system</li> </ul>	

#### **Indicative Timelines**

AEMO

(As of 7 March 2024)



AEMC Formal Consultation

B2B-WG Change Pack Development

IEC Change Pack engagement

Formal Consultation

System and Process Development, testing and release

<sup>\*\*</sup> Please note, the IEC's preferred approach to implementing New Rules is a traditional 'waterfall' approach i.e. AEMC Final Determination and Rules are published prior to any required IEC consultations commencing

- Blaine Miner (AEMO) spoke to the "What's on the B2B horizon?" slides
- No comments or actions were noted



# Forward Agenda

Blaine Miner (AEMO)

## Forward Agenda



Month	Proposed Agenda	Meeting Type
9 May 2024	<ul> <li>Standing agenda items: <ul> <li>Action Log, ICF Register Update, B2M Update, 'What's on the B2B horizon?'</li> </ul> </li> <li>IEC Consultation planning and preparation</li> <li>Unlocking CER benefits through Flexible Trading Draft Rule</li> <li>B2B Guide improvement review update</li> </ul>	Virtual

- Blaine Miner (AEMO) spoke to the 'Forward Agenda' slide
- No comments or actions were noted



### **General Business**

Blaine Miner (AEMO)



#### Other Business

- B2B/MSR-WG face-to-face meeting scheduled for Tues/Wed (23-24) April 2024 in Melbourne
  - AEMO Offices: Level 12, 171 Collins Street
  - The face-to-face is to start at 9am local time on Tues 23 April and end at 2pm local time on Wed 24 April
- Next B2B-WG monthly meeting scheduled for 9 May 2024
- Are there any other business items members wish to raise?

- Blaine Miner (AEMO) spoke to the 'General Business' slide
- No comments or actions were noted



# Appendix



Meeting	Sector	B2B Rep	Indicative agenda
19 March 2024	Network	Graeme Ferguson (Essential)	<ul> <li>IDAM, IDX, PC</li> <li>NEM Reform committees/forums</li> <li>B2B-WG Update/Information Paper</li> </ul>
3 June 2024 (face-to-face)	Retailer	Sean Jennings (Red/Lumo)	<ul> <li>IDAM, IDX, PC</li> <li>NEM Reform committees/forums</li> <li>B2B-WG Update/Information Paper</li> <li>Unlocking CER benefits through Flexible Trading</li> </ul>
9 Sept 2024	Metering	Dino Ou (Intellihub)	<ul> <li>IDAM, IDX, PC</li> <li>NEM Reform committees/forums</li> <li>B2B-WG Update/Information Paper</li> <li>Unlocking CER benefits through Flexible Trading</li> </ul>
2 Dec 2024 (face-to-face)	All sectors	All members	<ul><li>Year that was, Year to be</li><li>Draft Annual Report 2024</li><li>Draft IEC Budget 2025-26</li></ul>



Mr Kee Wong (Chair)

Mr Robert Lo Giudice (Retailer Representative)

Mr Paul Greenwood (Metering Representative)

Mr Luke Jenner (Distributor Representative)

Ms Jill Cainey (Consumer Representative)

Mr Peter Van Loon (Discretionary Member - Retailer)

Mr Marco Bogaers (Discretionary Member - Embedded Networks)

Meghan Bibby (AEMO, IEC Secretariat)



Sector	B2B WG Rep	Organisation	IEC Meeting
Retail	Mark Riley	AGL	Dec 2022
	Aakash Sembey	Origin	Feb 2023
	Sean Jennings	Red/Lumo	June 2024
	Gavin Wise	Alinta	
	Jo Sullivan	EA	
Metering	Dino Ou	Intellihub	Sept 2024
	Helen Vassos	PLUS ES	
	Paul Greenwood	Vector	IEC member
	Wayne Farrell	Yurika	Aug 2023
Network	Justin Betlehem	AusNet	
	Graeme Ferguson	Essential	March 2024
	Robert Mitchell	EQL	
	David Woods	SAPN	
	Adrian Honey	TasNetworks	

#### **ICF Gates**



Gate	Entry Criteria	Exit Criteria	Outcome
0 – ICF Preparation	Issue or change identified	Entry criteria for Gate 1 achieved	ICF circulated to the B2B WG members for Initial Assessment purposes
1 - B2B WG Initial Assessment	<ul> <li>Mandatory ICF sections populated to the required standard</li> <li>ICF reviewed by a B2B WG member prior to submission</li> <li>Proposed solution provided, where available</li> </ul>	<ul> <li>ICF populated to the required standard</li> <li>Additional information has been requested and received</li> <li>Options analysis has been completed</li> </ul>	B2B WG informs the Proponent of the outcome of Gate 1
2 - B2B WG Detailed Assessment	<ul> <li>ICF fully populated to the required standard</li> <li>Options analysis has been completed</li> </ul>	<ul> <li>Recommendation to the IEC determined</li> <li>IEC Paper has been prepared</li> <li>Inclusion into the next IEC Agenda has been confirmed</li> </ul>	B2B WG informs the Proponent of the outcome of Gate 2
3 - IEC Initial Assessment	<ul> <li>ICF populated to the required standard</li> <li>IEC paper completed and circulated</li> </ul>	<ul> <li>Additional information has been requested and provided, where applicable</li> <li>IEC decision confirmed</li> </ul>	• IEC informs the Proponent of the outcome of Gate 3
4 - IEC Change Pack creation	IEC decision to progress to Gate 4	<ul> <li>Change Pack prepared</li> <li>Inclusion of the ICF into the IEC Agenda has been confirmed</li> </ul>	IEC Change Pack ready for consultation
5 - Formal Consultation	Change Pack completed to IEC standards	IEC publishes Final Determination	ICF ready for implementation



For more information visit

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