



2 September 2019

5 Minute Settlement
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Submitted via email: 5MS@aemo.com.au

FIVE-MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2) DRAFT DETERMINATION PAPER – AUGUST 2019

Origin Energy Limited (Origin) welcomes the opportunity to comment on AEMO's Metering Procedures Change (Package 2) Draft Determination Paper and associated proposed changes to Metering Procedures.

Origin acknowledges contributions by AEMO and all other market participants in the development of procedures to support an efficient and effective market to achieve the National energy objective (NEO). AEMO's proposed model of including non-contestable unmetered supply loads (NCONUML) sites in MSATS to enable Global settlement is a good step in the right direction. However, it does not go far enough to deliver market operational efficiency and customer outcomes. Origin considers that market procedures require further enhancements for an efficient operation in the supply of electricity for non-contestable unmetered sites.

Origin have provided a detailed Participant Response to the proposed changes and requests the following items in relation to the management of non-contestable unmetered supply loads (NCONUML) be addressed by AEMO in the final Metering Package 2 Procedures:

1. **Same asset type and load profile per meter** - AEMO should mandate in the procedures that every NCONUML created in MSATS at the meter (device) level must have the same device type, load profile and network tariff rate. This provides a more efficient data model that enables transparency to the customer on the load and accurate settlement of associated charges.
2. **One market participant to have ownership of data in MSATS** - Networks should have an obligation to maintain NCONUML assets in MSATS accurately, as they do currently for Type 7 Contestable loads. A well-defined data model implemented for NCONUML would ensure MSATS is the source of truth for all standing and consumption data. This will standardise the process for all NMIs in MSATS and remove bilateral processes between market participants that are subject to potential errors.
3. **Alignment of B2B and B2M processes** - AEMO should specify market participant obligations in the procedures in relation to NCONUML sites for set up, maintenance and abolishment using the existing defined B2B and B2M market processes. This provides participants with certainty on the processes required to be undertaken to maintain NCONUML assets and not follow off-market processes.
4. **Centralised unmetered asset list with load** – AEMO to include non-contestable unmetered assets in the existing centralised unmetered asset list with load to enable a consistent approach across the National Electricity market.

Origin would welcome a further industry workshop to discuss in detail the above mentioned suggestions in the spirit of developing effective market procedures to meet the rule change outcomes.

Should you have any questions or wish to discuss this information further, please contact Mario logha via email Mario.logha@originenergy.com.au phone, on (03) 9821 8213

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Arun Wadhwa', with a horizontal line underneath the name.

Arun Wadhwa
Manager, Market and Metering
Origin Energy