

Table 1 – Retail Electricity Market Procedures – Glossary and Framework

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	Active Stream		General	<ul style="list-style-type: none"> When referencing sections within a documents please include the headings When referencing published documents reference the correct name of the document. <p>The Documents referenced in the below 2.3.3 -2.8 are all AEMO documents which have been developed and published due to the NER. It is redundant to reiterate in each section that it is an AEMO requirement or AEMO is required when the NER clause has been referenced</p>	<p>It is not a requirement of AEMO's style guide that section references include headings. Please specify which document name you think is referenced incorrectly.</p> <p>Your final comment goes to style, which is an individual matter.</p>
2.	AGL & Ergon Retail		General Comment	<p>This glossary is now a related document in a substantial number of AEMO procedures. It may be of value to list all the documents which reference the glossary for future cross checking when a definition is added or amended.</p> <p>This table will be very useful in the future to use as a 'quick links' to find the relevant procedural or guideline document.</p> <p>Could you please make sure that all documents referenced in the Figure 2 (Retail Electricity Market Procedures) are included in this table with the relevant links.</p>	<p>We expect this to occur over time as the remaining documents are brought into the 'family'. Agreed on the other point. We have carried out this cross-check and amended the table accordingly.</p>
3.	Red and Lumo Energy & ActewAGL		General Comments	<p>The location of related AEMO documents is not complete and should be updated to include the location of all documents.</p> <p>We also suggest all other referenced documents and procedures locations within the document are included and updated, we have highlighted these specifically below.</p> <p>Finally, Red and Lumo would like to see a complete set of Procedures and non-Procedure Guides/Guidelines/procedures/processes that will be effective on 1 December 2017 published on the AEMO website (in one spot).</p>	<p>It is not complete because the location of these documents is not yet finalised. We have inserted the consultation webpage as a link, but this will probably change, when we will update the table as a minor change (ie no consultation required).</p>
4.	AGL	2.2	Structure of Retail Electricity Market Procedures	<p>This section provides the framework for all relevant documents and should be the lead in to the discussion and description of these documents.</p>	<p>Noted the present location of this text flows naturally in the framework section of the document.</p>
5.	Aurora Energy & AGL	2.2	Structure of Retail Electricity Market Procedures	<p>Any document identified here should be listed in the related document list with a publication location.</p>	<p>Agreed.</p>
6.	Red and Lumo Energy	2.2	Structure of Retail Electricity Market Procedures	<p>This section outlines the framework for market participants and should also include a table reference which details the location of these documents for reference.</p>	<p>Section 1.3 provides the location.</p>
7.	Tango Energy	2.3.2	Metrology Procedure: Part B	<p>The Unmetered Load Guideline, published separately from Metrology Procedure: Part B, is not the subject of consultation under the NER. It details the process by which the Load Table is updated.</p> <p>The document is published separately as the Unmetered Load Guideline and is not subject to consultation under the NER.</p> <p>This is a repetition of the first sentence.</p>	<p>Noted, and amended.</p>
8.	Active Stream	2.3.3	Special and Technology Sites	<p>Reword to a consistent approach with the other pre POC sections. i.e.</p> <p>The Special and Technology Sites Document has been published in accordance with clause 7.8.12(c) Stating that AEMO has published the Special and Technology Sites Document to fulfil this requirement is redundant.</p>	<p>The requirement to publish this document is expressed differently in the NER to many of the other procedural documents, hence the different wording.</p>
9.	AGL	2.3.3	Special and Technology Sites	<p>The location for the special site list is not provided in this document or others. Suggest this document and its publication location be included in the related documents list.</p>	<p>Agreed.</p>
10.	Aurora Energy & Red and Lumo Energy	2.3.3	Special and Technology Sites	<p>AEMO has published the Special and Technology Sites Document to fulfil this requirement. Is this a place holder for when this document is published ? If so there also needs to be a link to this document in the Glossary and other relevant documents.</p>	<p>The link is in section 1.3.</p>
11.	Active Stream	2.4	Guidelines for the Clarification of the National Measurement Act	<p>Suggest rewording to:</p> <p>The Clarification of the National Measurement Act Guidelines have been developed and published in accordance with clause 7.16.8. They have been established in consultation with the National Measurement Institute to clarify the application of the requirements of the National Measurement Act 1960 (Cth) to metering installations.</p>	<p>We appreciate the sentiment but the rewording does not add anything to AEMO's drafting.</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

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12.	AGL	2.4	Guidelines for the Clarification of the National Measurement Act	The National Measurement Act guidelines similarly do not have a publication reference. Suggest this document and its publication location be included in the related documents list.	Agreed.
13.	Aurora Energy	2.4	Guidelines for the Clarification of the National Measurement Act	“These guidelines have been developed in consultation with the National Measurement Institute and are published on AEMO’s website” Again is this a place holder? if so there also needs to be a link to this document in the Glossary and other relevant documents.	The link is provided in section 1.3.
14.	Origin Energy & Red and Lumo Energy	2.4	Guidelines for the Clarification of the National Measurement Act	Provide link or location of where to find this document on AEMO’s website.	The link is provided in section 1.3.
15.	Tango Energy	2.5	B2B Procedures	Suggest the following rewording: B2B Procedures are developed and published in accordance with clause 7.17.2(i) of the NER. As permitted by clause 7.17.4(g) of the NER, they are as follows: The Information Exchange Committee is also required to develop the following documents relating to its operations that AEMO is required to publish under clause 7.17.2 of the NER:	Agreed.
16.	AGL, Aurora Energy & Red and Lumo Energy	2.8	Metering Data Provision Procedures	This statement would be better placed with the service level procedures for MDPs – cl 2.7.2. We recommend that this is moved from 2.8 to be in a new section called ‘Other Procedures made under the NER’	Section 2.7 addresses the provision of services by MPs, MDPs, MCs and ENMs. This is about the provision of data to customers by DNSPs and Retailers. We have structured the NER mandated documents (as depicted in Figure 2) and the non-NER mandated documents (as depicted in Figure 3) by function and do not see the value in restructuring the manner in which the inter-relationships between documents have been presented.
17.	Tango Energy	2.8	Metering Data Provision Procedures	Suggest the following rewording: AEMO is required to publish these procedures in accordance with clause 7.14(a) of the NER. These procedures establish the minimum requirements for the method and form in which metering data is to be provided to a retail customer (or its customer authorised representative) in response to a request from that retail customer or its customer authorised representative to the retailer or the DNSP.	The drafting in section 2.8 mirrors that of NER 7.14(a).
18.	Red and Lumo Energy	2.7.3	Service Level Procedure - Embedded Network Managers	We recommend that the text in this section includes the NER reference to be consistent with the remainder of 2.7	Agreed.
19.	AGL	2.7.4 & 2.7.5	Guide to the Role of Metering Coordinator Guide to Embedded Networks	This statement is sandwiched between two statements regarding Embedded Networks and would be better placed after the qualification procedure.	We have moved the Guide to MCs to follow the Guide to Embedded Networks. We don’t think it is too jarring any more.
20.	Red and Lumo Energy	2.7.4	Guide to the Role of Metering Coordinator	Include the location of document that is published and maintained by AEMO as it is not referenced within this document. We recommend that this is moved from 2.7.4 to be in a new section called ‘Other Procedures made under the NER’.	The link is in section 1.3. See also response to item 16.
21.	Red and Lumo Energy	2.7.5	Guide to Embedded Networks	We recommend that this is moved from 2.7.5 to be in a new section called ‘Other Procedures made under the NER’	See response to item 16.
22.	Origin Energy	2.6.6	RoLR Procedures	Provide location of NEM ROLR Processes document.	The link is in section 1.3.
23.	ActewAGL, Tango Energy & Aurora Energy	5	Supporting documents	5.3.3 - B2B User Interface Guide No description under heading	The document will not exist after 1 December 2017. The placeholder will be removed.
24.	AGL	5	Supporting documents	Since a document hierarchy and framework has been established in section 2.2, why is this extended in multiple chapters, up to this chapter. It would be far more logical and useful to discuss the documents starting with the document stream (eg Metrology, MSATS etc.) and then work through the various documents in that stream following the diagrammatic representation shown in Figure 2. Eg Metrology Part A	We thought it better to separate those documents that are required by the NER from those that are explanatory, or support the application of the NER or procedures under the NER. The order in which documents are discussed in sections 2 and 4 largely follows the figures.

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				<p>Part B Minimum Services Specification ... Special and Technology Related sites</p> <p>MSATS CATS Procedures.....</p>	
25.	Red and Lumo Energy	5	Supporting documents	We also suggest a clear and concise mapping of all relevant supporting documents under each sections to extend with the location of these procedures for reference. (May be better suited as a Table under Section 5 that includes document name, description and location, instead of separated by sections)	Figures 2 & 3 provide the necessary mapping. Locations can be found in section 1.3.
26.	Red and Lumo Energy	5	Supporting documents	<p>The inclusion and amendment of the “METER CHURN PROCEDURE FOR FINANCIALLY RESPONSIBLE MARKET PARTICIPANTS V1.0” https://www.aemo.com.au/-/media/Files/PDF/Meter-Churn-Procedure-FRMP-v10-clean.pdf be included in Figure 3 and referenced in this section.</p> <p>This should be placed in the newly created section called ‘Other Procedures made under the NER’, and note that it is found in Metrology Part A.</p>	Meter churn is covered in section 2.3.1. Note that the document referred to in the submission will be redundant from 1 Dec 17.
27.	Tango Energy & Aurora Energy	5.2.8	Technical Guide to Bulk Data Tool	There is no description provided for this document.	The document will not exist after 1 December 2017. The placeholder will be removed.
28.	Tango Energy	5.2.9	MSATS CATS Hints and Tips	<p>Suggest the following rewording:</p> <p>This document provides hints and tips on how to ensure requests are successfully loaded into MSATS. It provides information on MSATS validation and tips on using MSATS reports. It should be used as an addendum to the CATS Procedures.</p>	The drafting has been improved.
29.	Aurora Energy	5.3.4	B2B Mapping to aseXML	Change to : “This document maps the Business Documents, Business Signals and business items to aseXML, this may include .csv payloads”	AEMO considers that the current description is adequate.
30.	Aurora Energy	5.4.4 (b)	NEM12 & NEM13 File Clarifications	Change to: “This document provides clarifications from the B2B/MDM Working Group that will assist Participants conform to the technical format requirements detailed in the MDFF NEM12 and NEM13 Specification – this does not need to refer the working group.”	Agreed.
31.	Active Stream	6	Glossary – Completed - NSRD	<p>Completed or COM: suggest splitting the B2B SO and MSATS reference as COM does not apply to B2B ServiceOrderStatus.</p> <p>NSRD: The date of the Next Scheduled Meter Reading of a metering installation.</p> <p>Remove the word ‘Actual’ as it may not occur and everything else beyond installation is superfluous.</p>	<p>Agreed.</p> <p>The definition has been redrafted.</p>
32.	CitiPower/Powercor	6	Glossary – MDM Contributory Suffix - NMI Datastream	<p>CitiPower and Powercor recommends the term ‘MDM Contributory Suffix’ is updated to remove the reference to MDM given this suffix is not used in the MDM system.</p> <p>Furthermore, we also suggest the NMI suffix title is changed to MDM Suffix to reflect this is the stream of data for the MDM system (proposed definition below).</p> <p>This change will clearly delineate between the suffix on the Meter Register and the suffix on the Datastream in the MSATS master tables and provides consistency on what is provided in the MDFF.</p> <p>The proposed changes do not affect what is currently built.</p> <p>For meter register term ‘Suffix’:</p> <p>MDM Contributory Suffix A suffix defined in sections 6 and 7 of the NMI Procedure used to identify a stream of metering data and is consistent with the ‘NMISSuffix’ contained in the 200 record of the MDFF interval metering datafile and the 250 record of the MDFF accumulated metering data file.</p> <p>New term for Glossary for Datastream ‘MDM Suffix’:</p> <p>MDM Suffix A datastream suffix defined in sections 6 and 7 of the NMI Procedure used to identify a stream of metering data delivered for AEMO settlement purposes and is consistent with the ‘MDMDataStreamIdentifier’ contained in the 200 record of the MDFF interval metering datafile and the 250 record of the MDFF accumulated metering data file.</p> <p>The definition for ‘NMI Datastream’ also requires the following update:</p>	Full review of use of these terms as used in procedures will need to be done before changes can be made – please raise in further consultation as AEMO proposes to make no change at this time.

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				<p>NMI Datastream The term used to represent a NMI MDM suffix required by MDM to enable the metering data associated with a NMI to be correctly identified.</p> <p>The proposed changes need to also be reflected in the MSATS CATS and WIGS procedures. CitiPower and Powercor has made the same recommendations in the relevant procedure clauses.</p> <p>It is also recognised these changes needs to be reflected in the MDM File Format and possibly in the Standing Data for MSATS procedures.</p>	
33.	ActewAGL	6	Glossary – FRMP	<p>Capitalisation – for Financially Responsible and Retailer (to make capitalisation consistent with the other definitions of Participants.</p> <p>financially responsible Market Participant, usually a retailer, Generator, Market Customer or an MSGA, identified as such in respect of a connection point in MSATS.</p>	<p>These terms are defined in the NER with no capitals. Our drafting philosophy (articulated over a year ago) was to use NER-defined terms where they exist and to create new definitions where necessary for the POC Procedures. Hence, NER-defined terms appear in italics as they appear in the NER; new terms are capitalised. The requested change will not be made.</p>
34.	ActewAGL	6	Glossary – General	<p>Use of ‘See’ versus ‘See also’ for reference to other sections – inconsistent – should use same terminology across the Glossary – either all ‘See’ or all ‘See also’</p>	<p>Out intention is as follows: Where a primary resource is being cited, ‘see’ is the correct direction, whereas if further information can be found in another resource, ‘see also’ is used. A couple of corrections have been made to align the drafting with our intention.</p>
35.	Aurora Energy, Endeavour Energy & Active Stream	6	Glossary – Objection	<p>The term ‘Objection’ should make reference to a New Participant being able to raise an objection.</p> <p>We suggest rewording the definition of Objection to: “A type of transaction raised in relation to a Change Request whereby a Current or New Participant may object to the Completion of a Change Request on grounds that are permitted by the applicable Jurisdiction.”</p>	<p>Agreed. The definition is now more generic.</p>
36.	Aurora Energy	6	Glossary - RoLR	<p>No definition for actual RoLR but mention numerous through several documents including this glossary.</p>	<p>ROLR is a defined term in the NER.</p>
37.	AGL & United Energy	6	Glossary - ‘Whole current’	<p>As whole current is used as terminology across the various procedures it would be prudent to define this form of metering – eg: Whole current - means a meter which is directly connected in line with the load.</p>	<p>The term is used in Chapter 7 of the NER and given its natural meaning. In light of that, AEMO does not consider it appropriate that a definition be given to the term for the purposes of these procedures.</p>
38.	AGL, Vector AMS, Aurora Energy & United Energy	6	Glossary - LNSP	<p>Incorrect definition in relation to an embedded network. The LNSP for an embedded network is the EENSP not the ENM.</p>	<p>Agreed.</p>
39.	AGL & Red and Lumo Energy	6	Glossary - NEM Retail Operations Contacts List	<p>The AEMO document entitled: NEM Retail Operations Contact List often referred to as the ROCL</p>	<p>Agreed.</p>
40.	AGL	6	Glossary - Old Retailer	<p>Definition incorrect – as Retailer is a subset of FRMP Any previous Retailer for that NMI</p>	<p>Agreed, but we have used the NER-defined term.</p>
41.	Red and Lumo Energy	6	Glossary - Old Retailer	<p>Suggestion this should be redefined as ‘Previous FRMP’ instead of referencing ‘retailer’ only.</p>	<p>See response to item 40.</p>
42.	AGL	6	Glossary - ROCL	<p>Refer to NEM Retail Operations Contacts List</p>	<p>Abbreviations are not listed separately in the Glossary.</p>
43.	Red and Lumo Energy Red and Lumo Energy AGL ActewAGL	6	<p>B2B Definitions - Accept</p> <p>B2B Definitions - Appointment</p> <p>B2B Definitions - B2B</p> <p>B2B Definitions - Business Document</p>	<p>The situation wWhere a Recipient of a B2B Message Interaction has agreed to process it further to facilitate the request from Initiator</p> <p>An agreement between an End User (and their agent), a retailer and a Participant for the Participant to perform requested work at a specified time.</p> <p>The definition of B2B is also used in the NEM RoLR procedures, so should be coloured green, not blue.</p> <p>List is missing SiteAccessRequest, RemoteServiceRequest, RemoteServiceResponse, NetworkTariffNotification, MeterExchangeNotification.</p> <p>Think OneWayNotification doesn’t belong as the ones following are the actual transactions.</p> <p>The transaction that contains the business content for:</p> <ul style="list-style-type: none"> <input type="checkbox"/> MeterDataNotification <input type="checkbox"/> ProvideMeterDataRequest <input type="checkbox"/> VerifyMeterDataRequest <input type="checkbox"/> ServiceOrderRequest 	<p>AEMO is unable to make a substantive change to a B2B definition. This is a matter that should have been raised and addressed during the IEC’s consultation. AEMO has referred this issue to the B2B Working Group for further action.</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
				<input type="checkbox"/> ServiceOrderResponse <input type="checkbox"/> CustomerDetailsNotification <input type="checkbox"/> CustomerDetailsRequest <input type="checkbox"/> SiteAccessNotification <input type="checkbox"/> OneWayNotification <input type="checkbox"/> PlannedInterruptionNotification <input type="checkbox"/> MeterFaultandIssueNotification <input type="checkbox"/> NoticeOfMeteringWorksTransaction <input type="checkbox"/> NotifiedPartyTransaction	
	Aurora Energy		B2B Definitions - BusinessAcceptance, BusinessReceipt, BusinessRejection, Business Signal	These definitions do not match the Technical Guides definition	
	AGL		B2B Definitions - BusinessAcceptance	Definition is somewhat unclear and doesn't show relationship to B2B – suggest A Business Signal indicating acceptance of a B2B request	
	Red and Lumo Energy		B2B Definitions - BusinessAcceptance	A Business Signal from the Recipient indicating acceptance of B2B Document to the Initiator	
	AGL		B2B Definitions - BusinessReceipt	Definition is somewhat unclear and doesn't show relationship to B2B – suggest A Business Signal indicating that a Business Document has been received via B2B and is readable.	
	Red and Lumo Energy		B2B Definitions - BusinessReceipt	A Business Signal to the Initiator indicating that a Business Document has been received via B2B and is readable	
	United Energy		B2B Definitions - BusinessReceipt	This term is already defined in a more meaningful way in the B2B Technical Delivery Specification, which is also the correct context for its use. UE suggests pointing the reader to the definition in the TDS to avoid having two misaligned definitions within documents.	
	AGL		B2B Definitions - BusinessRejection	Definition is somewhat unclear and doesn't show relationship to B2B – suggest A Business Signal indicating that a Business Document failed a relevant B2B business rule validation	
	Red and Lumo Energy		B2B Definitions - BusinessRejection	A Business Signal to the Initiator indicating that a Business Document failed a relevant B2B business rule validation and is not accepted	
	United Energy		B2B Definitions - BusinessRejection	This term is already defined in a more meaningful way in the B2B Technical Delivery Specification, which is also the correct context for its use. UE suggests pointing the reader to the definition in the TDS to avoid having two misaligned definitions within documents.	
	AGL		B2B Definitions - Business Signal	Definition is somewhat unclear and doesn't show relationship to B2B – suggest A response generated by a Recipient upon receipt of Business Document via B2B to indicate whether a Business Document:	
	United Energy		B2B Definitions - Business Signal	This term is already defined in a more meaningful way in the B2B Technical Delivery Specification, which is also the correct context for its use. UE suggests pointing the reader to the definition in the TDS to avoid having two misaligned definitions within documents.	
	AGL		B2B Definitions - REC	Definition needs modification Registered Electrical Contractor: A person who is registered in that role by the relevant safety regulator in each jurisdiction.	
	Red and Lumo Energy		B2B Definitions - Recipient	The B2B term is defined as a transaction or acknowledgment limits this definition, suggestion to open this to a commonly referenced term as a 'B2B Interaction or Document'; Recipient The receiver of a B2B Transaction or B2B Acknowledgement Interaction or B2B Document. This can be either a notification, request for data or request to perform work.	

Table 2 – Metrology Procedure Part A

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

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1.	ActewAGL	Lots	All over the place	Clause references in jurisdictional differences are now all incorrect due to the reformatting of this document. Please correct throughout document. Clause reference no longer exists e.g. 2.6.1 [SA](2)	Cross-referencing will be amended in accordance with clause 7.16.7(e) of the NER. See also response to item 18. Agreed on the references to jurisdictional instruments, however, AEMO is unable to make the required corrections without approval from the participating jurisdictions.
2.	Active Stream			In many instances networks remove or bypass meters due to necessary work eg. faults etc. and they do not inform the MP that this has occurred resulting in unnecessary field visits by the MP just to find out that meter has been removed/passed. There is no clause in the updated procedure that puts onus on the Network that they must tell the MP if metering has been altered in any way shape or form by the network. We suggest that there be a formal process and obligation that the Network notify the MP if there are any metering alterations that the MP would not be aware of. Note: Currently, networks do not notify the MP if the meter is bypassed to get customer back on supply in emergency situations.	AEMO considers that this issue should be addressed by business processes between the FRMP, LNSP, MC and MP, as all of these parties have an interest (financial, customer service and regulatory) in ensuring any such issues are resolved. The FRMP should be aware of any faults at its customers' connections and how the faults were resolved by the LNSP. This information should be passed by the FRMP on to the MC and in turn, the MP, where the metering installation has been affected. This is not an appropriate subject matter for the Metrology Procedure as it does not relate to metrology.
3.	AGL, Endeavour Energy & United Energy	0	General	Consultation improvement: We note that AEMO's intention is to make this procedure effective from 1 December 2017 however the consultation paper suggests that the final determination will be published by 30 November 2017. For this procedure to be effective from 1 December then the final determination must be published 3 months prior as per clause 7.16.3.b of the NER. We suggest that the consultation paper be updated to comply with the NER obligation.	Agreed, AEMO will publish the final version of the updated procedure by 1 September 2017.
4.	AGL, Aurora Energy, AusNet Services & United Energy	2	Dispute Resolution	Clause 8.2 applies to Registered Participants, in relation to specific matters and has multiple exclusions. The Dispute resolution process is not one to be activated lightly, particularly on the case of contractual matters, where the contracts will have defined dispute processes. AGL seeks clarity as to whether this mechanism can apply to a dispute involving an MP or MDP, who are not Registered Participants. This requirement needs to be considered in the hierarchy of dispute mechanisms, which should start with operational arrangements, contractual, market and then legal processes. As a minimum, it is suggested that this clause be re-written to allow for parties to use their contractual dispute processes before activating the formal DMS process. However, this clause is superfluous as the NER provides access to the NER dispute mechanism.	This provision is a legacy from the original Metrology Procedure and has been carried through to this version. Clause 8.2.1(a1) of the NER expands the range of parties who are considered to be "Registered Participants" for the purposes of clause 8.2, which includes MDPs and MPs. Since MCs are Registered Participants in any event, clause 8.2 would apply to them, as well. From AEMO's perspective, any dispute concerning AEMO's actions or the application of the Metrology Procedure should be subject to the dispute resolution process prescribed in the NER. Any dispute to which AEMO may be a party can only be resolved in this way as it is not a party to any contract. By the same token, AEMO does not wish this provision to be interpreted as precluding participants from entering into alternative dispute resolution mechanisms in their contracts as between themselves. In light of the general application of clause 8.2 of the NER generally, we have determined to delete section 2 and consider that any dispute involving AEMO would have to be addressed via the clause 8.2 process regardless.
5.	Active Stream	5.1.3. Completion Rates	Other Issues Related to Consultation Subject Matter	This is a specific test and will require custom HW and testing Jig. When will it be requested by AEMO and how much time will they give the MC to demonstrate compliance. No specifics are provided in the documents. What is a reasonable time period in this context?	AEMO considers that this information should reasonably be able to be provided by an MC at any time, as an MC for a small customer metering installation must have evidence that metering installations are compliant with the requirements of the NER.
6.	AGL, Aurora Energy	5.2	Technical requirements	Suggest review of Remote Reconnection Service definition in Table 5.1 As a result of safety requirements the re-connection may not be completed, but rather not completed as a result of load. Therefore, a better definition may be 'Service attempted within 1 minute....'	Section 5.1 provides the framework under which compliance will be assessed and it does not preclude the development and application of technical or safety standards associated with these services. The completion of a service may, subject to the application of an Australian Standard, result in a service being completed with a negative result (i.e. that the metering installation could not reconnect supply due to a pre-set condition as required by the Australian Standard). AEMO proposes no change to this section.
7.	Simply Energy	8	Reversion of Metering Installation Types	If a COMMS4 to MRAM is considered a reversion, please update this table to expand and vice versa.	Section 8 deals with jurisdictional metrology material and is therefore limited to considering matters related to type 5 and 6 metering installations only. Installation of type 4 or 4A metering installations is outside the scope of this section of the procedure. The only scenarios in which a type 4A metering installation can be installed are provided in section 7.8.4 of the NER.
8.	Active Stream	12.1	Preliminary Requirements	The MC may not be giving directions to the MP. They only have the obligation to ensure certain conditions are met. They will have clauses in agreements to ensure their Service Providers are compliant with the Rules. MP SLP Clause 3.2(b) actually states the requirement for the MP to return the network devices within 10 business days. Preliminary requirements Suggest rewording the paragraph: , the MC must ensure that the removed meter or network device is returned to its owner within 10 business days unless otherwise agreed with the asset owner.	The MC is responsible for the metering installation, including the actions undertaken by its appointed service providers. AEMO considers the requirements for the MC in this section to be reasonable. Specific requirements for the collection of metering data are provided in the Metering Data Provider Service Level Procedure (section 5), and as highlighted in the Ausgrid submission, are supported by the Metering Provider Service Level Procedure (section 4.3). AEMO does not consider there to be gaps in obligations for the collection of metering data, or for the return of metering equipment on removal of a metering installation. The only participant who can collect metering data from a metering installation is the Current MDP or in the case of a type 5 or 6 metering installation, the Current MPC. Therefore, if an agent of an MP undertook the collection of metering data, it would have to be in their capacity as an agent of, or subcontractor to, the Current MDP or MPC.

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APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
	AGL AusNet Services CitiPower/Powercor, SA Power Networks Ausgrid Business Services Red and Lumo Energy United Energy	12.1	Preliminary Requirements	<p>AGL has concerns over the removal of the clauses in 12.1.</p> <p>It is reasonable for the incoming MP to use reasonable endeavours to have the existing meter read in advance of a churn. It is noted that this can be problematic with the more advanced meters, but is certainly available for type 6 meters.</p> <p>This clause should also include an obligation to read the meter if it is possible or use reasonable endeavours to arrange for the meter to be read where it is a remote meter.</p> <p>The removal from Metrology Procedure Part A of the obligation on the current MC to ensure a Final Read at the time of de-commissioning of a meter that is being churned creates a gap in obligations.</p> <p>There appears to be no corresponding obligation in other instruments to ensure a Final Read is taken. Having this obligation on the MC has set the right balance in developing cooperative behaviour in facilitating the acquisition of final read, either locally or by the old MPB.</p> <p>Even if the B2B Procedures includes a field in a transaction to send the Final Read of a removed meter there should be an obligation to ensure the Final Read is taken. Hence AusNet Services recommends retaining this obligation in the Metrology Procedure Part A.</p> <p>CitiPower and Powercor and SA Power Networks recommend the various clauses that have been proposed to be removed be reinstated to strengthen the obligation on the MP to capture the Final Read when removing an accumulation meter. We believe the amended clause that requires the MC to ensure that the MP is directed to undertake the relevant work doesn't go far enough to ensure the Final Read is taken. Currently, the MP SLP does not contain an obligation on the MP to capture the Final Read for an accumulation meter like there is for a MDP for an interval meter (when requested by a MP). The MP SLP states in 4.4 (d) that the MP must "ensure that sufficient information is captured regarding the removal of the old metering installation components" but it does not specify that a reading must be obtained. Therefore we suggest it be retained in this procedure to ensure it is provided every time an accumulation meter is exchanged.</p> <p>Agreed. The need to capture final readings for removed metering installations is covered in section 4.3 of the metering provider service level procedures.</p> <p>Red and Lumo Energy support the amendments to the clause. However recommend retaining the obligation for a final read to be obtained. Recommended drafting: Before de-commissioning all or any part of an existing metering installation, including any network device, the MC must ensure: (a) that directions are provided to the MP undertaking the work in order that the removed meter or network device is returned to its owner within 10 business days unless otherwise agreed with the asset owner. (b) that arrangements are made to ensure a Final Reading is taken at the time of de-commissioning all metering data maintained in the existing meter. We suggest the amendments to ensure a positive customer experience. We consider that removal of the additional sub-clause will cause unnecessary issues as inaccurate customer billing is a cause for customer complaints.</p> <p>UE disagrees with the removal from Metrology Part A of the obligation on the current MC to undertake a Final Read at the time of de-commissioning of a meter that is being churned without there being a corresponding addition of obligations to the MP SLP. Presently in the MP SLP there is no obligation to capture the final read of an accumulation meter in the case of meter churn.</p> <p>The B2B Procedures have introduced the Notice of Metering Works and added the ability to record the final reading of a removed meter. The obligation to obtain this reading is currently strengthened by this clause in Metrology Part A. If it is removed then the obligation is weakened.</p>	<p>AEMO also considers that the proposed change would not have a clear and unambiguous application as it assumes that metering data is de-commissioned in meters, which may not be the case, and the term 'existing' does not clearly identify which meter or meters are being referred to.</p>
9.	Aurora Energy	12.1	Preliminary Requirements	<p>This clause should be extended to any participant who removes equipment including the DNSP</p> <p>Aurora Energy has concerns over the removal of the clauses in 12.1.</p>	<p>The NER place clear and unambiguous responsibilities and authority on who can undertake work on metering installations. The responsibilities for matters relating to a NMI abolishment such as metering equipment removal, equipment handling, data collection, data processing and delivery, updating MSATS records, etc. are</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
	AGL & Origin Energy			<p>It is reasonable for the incoming MP to use reasonable endeavours to have the existing meter read in advance of a churn. It is noted that this can be problematic with the more advanced meters, but is certainly available for type 6 meters.</p> <p>This clause should also include an obligation to read the meter if it is possible or arrange for the meter to be read where it is a remote meter.</p> <p>This clause should be extended to any participant who removes equipment.</p> <p>For instance, if an LNSP physically abolishes a site (service and 3rd party meter) then they should ensure that the meter is returned to the relevant MC. This is more complicated when ASPs are involved.</p> <p>'Before de-commissioning.....device, the participant (or party undertaking the work) must ensure that any metering equipment or network devices on site are returned to the asset owner within 10 business days , unless otherwise agreed.'</p>	<p>all established in the NER and procedures under the NER and fall to varying degrees on the MC, MP and MDP.</p> <p>As the NER does not provide authority for any other participant to remove the metering installation, it would not be appropriate for AEMO to place an obligation on the LNSP as proposed.</p>
10.	CitiPower/Powercor, SA Power Networks	12.1 (a) (i) (ii) & (b)	Preliminary Requirements	<p>The proposed changes do not meet AEMO's stated objective of making 'as built' changes as per the Notice of First Stage Consultation. The proposed changes could introduce complications in the midst of a busy period for all participants as they prepare for go live of the PoC related changes. All participants up until now have designed processes and solutions that expected the Final Read to be provided when the MP removed the meter.</p>	<p>It is intended that Work Package 3 consultation includes corrections of any errors that had not been picked up in Work Package 1 and Work Package 2.</p> <p>AEMO refers CitiPower/Powercor and SA Power Networks to previous responses regarding authority to collect metering data in the NER.</p>
11. 12.	ActewAGL Active Stream	12.2.1	Deemed Network Devices	<p>Point duly noted by AEMO, so why not provide rewording that is more suitable, to: Refer to clause 7.8.6 for information surrounding Network Device determinations and use.</p> <p>NER Clause 7.86 states:</p> <p>Network device procedures</p> <p>(i) AEMO must develop and maintain procedures that apply to:</p> <p>(1) Metering Coordinators and Local Network Service Providers and which specify when an existing metering installation that is to be replaced by a Metering Coordinator may be a network device for the purpose of this clause 7.8.6;</p> <p>Recommend that AEMO in accordance to the NER must specify when a metering installation may be a network device. This, in addition to the NER definition, would provide clarification to the MC and LNSP, where parties are in doubt.</p> <p>Alternatively, the reworded paragraph is not appropriate for Met Procedure.</p> <p>Suggest removing 12.2.1 if that is AEMO's position.</p> <p>What is the definition of a Network Device and who defines that a particular device is a Network Device and what will be the criteria? This needs clarification as previous text has been deleted.</p> <p>All documents need to be aligned including the NER (7.8.6).</p>	<p>The suggested text is unsuitable. Clause 7.8.6 of the NER is the primary reference for the regulation of network devices. AEMO is stating that it will not deem any further equipment as 'network devices' other than what is specified in the NER.</p> <p>We note that 'network device' is a defined term in the NER.</p> <p>AEMO has been given the power to deem equipment to be a 'network device' in addition to what the NER stipulates and, as AEMO is not deeming any further equipment as 'network devices' other than what is specified in the NER, AEMO considers it appropriate that section 12.2.1 stays as is.</p>
13.	AGL	12.2.1	Deemed Network Devices	<p>Lack of clarity in the proposed drafting could lead to issues in the market – eg removal of interval meters used for develop Net System Load Profiles.</p> <p>This section requires review and amendment to provide appropriate guidance to the market.</p>	<p>See response to item 12.</p>
14.	Red and Lumo Energy	12.2.1	Deemed Network Devices	<p>The NER require AEMO to publish the deeming of network devices under rule 7.8.6. Whilst we do not object to AEMO's revised decision, we consider it prudent for AEMO to provide more information as to the basis of their decision.</p>	<p>The requested information was provided in the Consultation Paper. It is not appropriate material for the Metrology Procedure.</p>
15.	AusNet Services, United Energy & CitiPower/Powercor	12.2.1	Deemed Network Devices	<p>AusNet Services contributed to and supports to the ENA's response in relation to clause 12.2.1 of the Metrology Procedures Part A. A summary of the response is outlined below.</p> <p>Chapter 10 of the National Electricity Amendment Rule 2015 No.12 (NER) clearly defines Network Device. Further the final rule determination and the final rule describe the incumbent metering installation as a network device.</p>	<p>Victorian AMI meters are subject to the same qualification criteria for a network device as other metering installations. As highlighted in submissions, Victorian AMI meters that meet the criteria of NER 7.8.6 will be treated as network devices and AEMO does not consider that any elaboration is required in this procedure.</p> <p>The proposed amendment does not align with the NER definition, which states that the 'network device' can be 'at, or adjacent to' a metering installation, so it cannot be only 'within' a metering installation.</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
				<p>The effect of the final determination should be that Victorian DNSPs will be able to retain and continue to use the meters they deployed under the AMI program as network devices. As such, we recommend the proposed changes to NER clause 12.2.1 of Metrology Procedure Part A with the following minor amendments in green and red (AEMO).</p> <p>12.2.1 Deemed Network Devices</p> <p>AEMO does not consider there to be any circumstances where it is necessary for AEMO to deem certain devices on a network within a metering installation to be network devices for the purposes of clause 7.8.6 of the NER, other than LNSP provided Victorian AMI meters.</p>	
16.	Energy Networks Australia	12.2.1	Deemed Network Devices	<p>Given the clarity of the definition provided in the NER, Energy Networks Australia is generally supportive of the proposed change to Clause 12.2.1 of Metrology Procedure Part A. However, some alternative wording is proposed.</p> <p>To address the issues detailed in our covering letter, Energy Networks Australia proposes the following alternate wording for Clause 12.2.1.</p> <p>AEMO does not consider there to be any circumstances where it is necessary for AEMO to deem certain devices within a metering installation to be network devices, for the purposes of clause 7.8.6 of the NER.</p> <p>I. Where the LNSP chooses to maintain a network device, the Metering Provider will need to ensure that the device remains, subject to any space limitations, and its configuration is not impacted, such that it can continue to provide the required network services.</p> <p>It should be noted that Victorian DNSPs will be able to retain and continue to use the meters they deployed under the AMI program as network devices, subject to any space limitations</p>	<p>AEMO considers that the obligations on the MC/MP with respect to network devices are clear under clause 7.8.6 of the NER.</p> <p>The proposed amendment to the first sentence does not align with the NER definition, which states that the 'network device' can be 'at, or adjacent to' a metering installation, so it cannot be only 'within' a metering installation.</p> <p>The proposed additional text is not required and is inappropriate as it restricts the MC's rights as provided in clause 7.8.6, in particular clause 7.8.6(f).</p>
17.	Endeavour Energy	12.2.1	Deemed Network Devices	<p>Procedural improvement: Clause 7.86.i.1 of the NER obligates AEMO to "...specify when an existing metering installation that is to be replaced by a Metering Coordinator may be a network device ...". The new wording of clause 12.2.1 could be interpreted that there are no scenarios where a network device will exist. For the avoidance of any doubt the procedure should make it clear that the LNSP has the right to define what devices installed at a metering installation are network devices provided that it aligns with the definition in the NER. We suggest rewording clause 12.2.1 to:</p> <p>"AEMO does not consider there to be any circumstances where it is necessary for AEMO to deem certain devices on a network to be network devices, for the purposes of clause 7.8.6 of the NER. For the avoidance of any doubt this does not prohibit the LNSP's right to define what devices installed at a metering installation are network devices provided that it aligns with the definition in the NER."</p>	<p>The criteria for determining whether a device is a network device is provided in the NER. The LNSPs do not have any right to 'define' what devices are 'network devices'.</p> <p>AEMO does not propose to make any change of the type suggested.</p>
18.	AGL, Aurora Energy & United Energy	13.2, 13.4 & 13.8	Meter Data Collection Access to Metering Data AEMO's Metering Data Obligations	<p>Clause 13.2 has a number of jurisdictional metrology tables which now have incorrect cross referencing. These jurisdictional obligations no longer have the correct references to clauses within the document.</p>	<p>Agreed. We will be updating these references in accordance with clause 7.16.7(e) of the NER</p>

Table 3 – Service Level Procedure (MDP)

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	AGL & Aurora Energy	2.1	Metering Data Services	An issue has been raised about an MDP's obligations in respect of illegal usage. Given the MDP may detect illegal usage, it seems reasonable to ensure that they have an obligation to advise financially affected parties if they detect illegal usage. AGL suggests a new sub-clause be added 2.1(h) If the MDP detects illegal usage, the MDP should advise the MC and the affected financial parties (eg FRMP, LNSP, LR).as soon as practical. This would also seem an appropriate obligation to place on the MC.	AEMO considers that this requirement is outside the scope of the SLP. However, there is nothing in the procedures that prevents parties from agreeing to provide such notice, in their commercial agreements.
2.	Energex & Ergon Energy Network	2.3 (ix)	de-activate Datastreams in MSATS only:	The wording of this clause is misleading. Upon initial review we sought advice from AEMO and were provided with confirmation that the new MDP SLP states you Must Only de-activate datastream in the list provided if you elect to do so. The clause does not state that the MDP can elect not to perform the de-activation of the datastream. Can the clause please be re-worded to state that this is the case? , e.g.: (ix) Where the MDP has elected to de-active datastreams, only de-activate those datastreams in MSATS:	The clause restricts the circumstances in which an MDP can de-activate datastreams in MSATS. AEMO proposes to retain the current wording.
3.	Active Stream	2.2	Insurance	This is an addition to the MDP SLP. Unclear if there is a requirement to hold an insurance policy for each Participant or if the MDP/MPB is the same organisation then one policy would suffice. Clarification is sought.	If the MDP and MP are the same entity, a single insurance policy that covers the operations of both MDP and MP roles will satisfy the insurance requirements under the MDP SLP and MP SLP. A note has been added to the MDP SLP and MP SLP to clarify. Due to confidentiality concerns, the requirement to provide certified copies of the insurance policies has been amended to providing certificates of currency of insurance.
4.	AGL	2.2	Insurance	Question re insurance. This Procedure requires insurance for the MDP. The MP has the same clause in the MP SLA. How is this managed within a single organisation – ie one MC/MP/MDP ? Does this require two separate policies, one policy for \$20M or one policy for \$10M across all entities.	
5.	Origin Energy	2.2	Insurance	Require clarification as to whether the \$10mil covers both MP and MDP services or is it \$10mil each.	
6.	Select Solutions	2.2	Insurance	Suggest the Insurance not to be open ended e.g remove "Not less than" and we wont ever actually give AEMO certified copies of our insurance policies, They are strictly confidential contracts between us and our insurers. Suggested rewording as per below: The MDP must: (a) hold public liability insurance for an amount not less than of \$10,000,000 per occurrence and \$10,000,000 in the aggregate; (b) hold professional indemnity insurance for an amount of not less than \$1,000,000 per claim occurrence and in the aggregate, which must be maintained for a period of seven years after termination of the MDP's registration; and (c) provide AEMO with certificates of currency for the above insurance policies certified current copies of insurance policies upon request. This should also apply to MP insurance clause	
7.	United Energy	2.2	Insurance	UE assumes given MC, MP and MDP need insurance that one policy of \$10m public liability will suffice for example across the three roles where the same legal entity is providing services in all three roles. UE requests that AEMO clarify in the Insurance clauses that a single policy (for example for \$10m) will cover all roles simultaneously.	
8.	Ausgrid Business Services	2.4	Specific Obligations for MDP – Category D	ABS contends the de-activation of datastreams when a NMI is de-energised (ie NMI Status = 'D') should remain optional. The ongoing delivery of metering data for de-energised NMIs is supported by metrology procedure Part B and is the basis of the ADWNAN reporting out of MSATS.	The clause restricts the circumstances in which an MDP can de-activate datastreams in MSATS and does not require alteration, it does not mandate that datastreams must be de-activated in the circumstances stated in the Ausgrid submission.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
				Furthermore, clause 2.4 (a) (ix) (D) cites only one specific method of de-energisation only, and the MDP has no way of validating a de-energisation of this method type. Suggestion:- Delete clause 2.4 (a) (ix) (D).	As a result, no amendments to the procedure are considered necessary.
9.	Endeavour Energy	2.4	Specific obligations for MDP - Category D	Procedural improvement: The removal of the word 'only' now means that the scenarios listed are mandatory but in other scenarios the MDP may optionally deactivate the datastream. The status of the datastream has a direct impact on whether metering data is included in settlements or not therefore we suggest that this clause explicitly lists scenarios when the datastream must be deactivated and not allow for any other scenarios. We suggest that re-instating the word 'only' back into the lead in sentence of clause 2.4 to make it clear that the scenarios listed in this clause are the only scenarios when the datastream can be deactivated	With regard to the Endeavour Energy submission, the word 'only' has not been proposed to be removed from the section 2.4.
10.	AGL	2.4.4	Special Site	Where is the special site list published ? What are the criteria for 'Special Sites' ?	The definition of 'Special Site' can be found in the Glossary and Framework document.
11.	Aurora Energy	2.4.4	Special Sites	What is the definition/ criteria for a special site – the Glossary does not provide a definition.	
12.	Endeavour Energy	3.12.1	Validated Metering Data to be Delivered	Procedural improvement: A number of different metering configurations are starting to appear where metering data is collected from meters that do not form part of a revenue or check metering installation. In these scenarios the metering data should not be sent to market participant unless agreed otherwise. Sending such metering data to market participants without prior agreement causes confusion and billing issues. For example, an additional meter may be installed for the benefit of the customer who wants to know how much energy a particular circuit or appliance is consuming. This additional meter is wired in series to the revenue meter that measures the energy consumed for the whole premises. To avoid double billing, the metering data from the additional meter should not be sent to market participant (unless agreed otherwise). We suggest rewording clause 3.12.1 to: "Each MDP must ensure only Validated metering data from metering installations classified as revenue or check is delivered to AEMO, New MDPs, Registered Participants and ENMs, unless otherwise agreed as per section 8.1"	AEMO considers that it is already clear that metering data must be from revenue or check metering installations. In the SLP, metering data has the meaning as defined in the National Electricity Rules. This definition refers to interval and accumulation metering data which in turn refer to data collected from a metering installation. The definition of metering installation notes that the metering installation must be classified as being for revenue purposes and/or as a check metering installation.
13.	AGL	3.12.4	Delivery of Settlements Ready Data	How is the Data Delivery Calendar established ? What consultation process is there for the calendar to change ?	The Data Delivery Calendar is established based on requirements of the rules with respect to market settlement.
14.	Ergon Retail	3.12.4	Delivery of Settlements Ready Data	How are the dates in the Data Delivery Calendar determined? Is this published?	A link to the published Data Delivery Calendar is provided in section 1.3.
15.	Origin Energy	3.12.4	Delivery of Settlements Ready Data	Make reference to section 1.3 as it provides link on where to find data delivery calendar.	Data Delivery Calendar is a defined term. AEMO propose that this change is not required.
16.	Aurora Energy	4.1.2, 7.1	Audit Trail of Metering Data Collection Services System	Who will have access to this audit? is it just AEMO or is the FRMP entitled to this information if required? Should this be stated in this section, in the Glossary or some other document?	Audit reports are provided to the MDP who is the subject of the audit. The MDP may agree to share that information with other parties.
17.	ActewAGL	5.1	Meter Churn Scenarios	Section 5.1 (a) - a type 6 metering installation to a new type 6 metering installation (Scenario 1); Is this still applicable in any jurisdictions after 1 December 2017? If yes, state which jurisdiction, otherwise remove reference to the section as well as diagram and scenario in its entirety. Section 5.1 (b) a type 6 metering installation to a type 1, 2, 3, 4, 4A, or 5 metering installation (Scenario 2);	As this issue was discussed during Work Package 1 consultation, please refer to Work Package 1 Final Determination – Appendix A – Table 4 – Line 59.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
				<p>Is Type 5 in the “To” still applicable in any jurisdictions after 1 Dec 2017. If yes, state which jurisdiction, otherwise remove reference to type 5 in the above section, and within the Scenario description.</p> <p>Section 5.1.(c) a type 1, 2, 3, 4, 4A, or 5 metering installation to a type 6 metering installation (Scenario 3);</p> <p>Is this whole scenario still applicable in any jurisdictions after 1 December 2017? If yes, state which jurisdiction, otherwise remove the reference to Scenario 3 (as well as the description and diagram within Scenario 3).</p> <p>In addition, depending on the response, Metrology part A section 8 (jurisdictional differences) will also require review.</p> <p>Section 5.1.(d) a type 1, 2, 3, 4, 4A, or 5 metering installation to a new type 1, 2, 3, 4, 4A, or 5 metering installation (Scenario 4).</p> <p>Is Type 5 in the “To” still applicable in any jurisdictions after 1 Dec 2017. If yes, state which jurisdiction, otherwise remove.</p>	
18.	Aurora Energy	5.1	Meter Churn Scenarios	A type 6 metering installation to a new type 6 metering installation (Scenario 1); - under the new rules this situation cannot happen – should this be removed?	
19.	Aurora Energy	5.1	Meter Churn Scenarios	(c) a type 1, 2, 3, 4, 4A, or 5 metering installation to a type 6 metering installation (Scenario 3); while Tasmania still has an approval process to revert to a type 6 meter it is highly unlikely to be used – is this still a considered scenario in AEMO’s view?	
20.	AGL	7	Quality Control	<p>This procedure requires auditing of the MDP function.</p> <p>Similarly, the MP SLA requires auditing of the MP function.</p> <p>Where is the auditing of the MC function, which now includes meter test management, meter installation design, data integrity etc. ?</p>	Requirements for MCs are in documentation associated with that role (e.g. registration application, guide to the role of the MC).

Table 4 – Service Level Procedure (MP)

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	AGL	2.2	Sub-Contractors	<p>The NER allows another person to install a meter (for example – an Authorised Service Provider – ASP – in NSW).</p> <p>The ASP (or other person) is appointed by the customer, not the MP, and is therefore not a sub-contractor, but rather an independent party authorised to install an MP’s meter.</p> <p>Suggest that this section be expanded to clearly cover parties other than sub-contractors undertaking work, such as meter installation by an ASP.</p>	In the context of the procedure, an ASP in NSW would be considered as a sub-contractor. Whilst an ASP may be appointed by a customer directly, any metering work would need to be performed under the auspice of an appropriately accredited Metering Provider. As a result, AEMO does not consider that changes to the procedure are required.
2.	Red and Lumo Energy	2.2	Insurance	We understand that AEMO has placed this requirement on MPs under rule 7.16.6(d). However, we would like to clarify, where a participant is both an MDP and an MP will AEMO require two sets of insurances or or one single policy combined?	<p>If the MDP and MP are the same entity, a single insurance policy that covers the operations of both MDP and MP roles will satisfy the insurance requirements under the MDP SLP and MP SLP. This has been added as a note in the MDP SLP and MP SLP.</p> <p>Due to confidentiality concerns, the requirement to provide certified copies of the insurance policies has been amended to providing certificates of currency of insurance.</p>
3.	AGL	2.3	Insurance	<p>Question re insurance</p> <p>This Procedure requires insurance for the MP.</p> <p>The MDP has the same clause in the MDP SLA.</p> <p>How is this managed within a single organisation – ie one MC/MP/MDP ?</p> <p>Does this require two separate policies, one policy for \$20M or one policy for \$10M across all entities.</p>	
4.	United Energy	2.3	Insurance	UE assumes given MC, MP and MDP need insurance that one policy of \$10m public liability will suffice for example across the three roles where the same legal entity is providing services in all three roles?	

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
				UE requests that AEMO clarify in the Insurance clauses that a single policy (for example for \$10m) will cover all roles simultaneously.	
5.	ActewAGL	4.2 (a) (iii)	Metering Data Validation Requirements	13.5 of Metrology Part A refers to Verification, so would recommend rewording this section 4.2 (a) (iii) to: ...data is verified in accordance...	Section 13.5 of Metrology Part A refers to the verification process, which includes Validating Metering Data. AEMO considers the term 'Validated' is appropriate in this section of the SLP MP.
6.	AGL	4.2 (a) (ii)	Metering Data Validation Requirements	Why does this clause only apply to metering which is NOT whole current metering ?	Clause 4.2 (a) (iii) applies to whole current small customer metering installations. Clause 4.2 (a) (ii) applies to metering installations that are not covered in Clause 4.2 (a) (iii).
7.	Ausgrid Business Services	4.3 (b)	Table 1: Notice of Completed Installation Work	ABS contends a 'meter reading' should be supplied for all manually read metering types (BASIC and MRIM only), and not limited to accumulation metering only. Suggested re-wording:- 'Where the metering installation work involves the removal of a manually read meter (BASIC or MRIM only).'	Meter Reading is included in this Notice to allow the identification of the work completed. It is not a data collection process as the party providing this information is an MP, not an MDP. AEMO considers the proposed change is not appropriate.
8.	Endeavour Energy	4.3.b	MSATS updates and notifications following Metering Installation Commissioning	Procedural improvement: This obligation should be updated to make it mandatory for the Metering Provider to notify the LNSP of metering work using the NOMW transaction as per the B2B procedure. This new B2B transaction was created with the support of the MC/MP representatives on the B2B Working Group because they wanted a national electronic format. We suggest rewording clause 4.3.b to: "Provide a Notification of Metering Work transaction as per the B2B procedure to the LNSP within 2 business days of completing any works on a metering installation unless agreed otherwise with the LNSP"	As this suggestion was put forward during Work Package 1 consultation, please refer to Work Package 1 Final Determination – Appendix A – Table 3 – Line 46.
9.	Ausgrid Business Services	4.4 (a) (i)	Meter Churn	ABS contends 'authorised to do so by the MC for the market load' is not consistent with the with the wording in other documents. Suggested re-wording:- 'authorised to do so by the Current MC'	Agreed. Procedure updated.
10.	VECTOR AMS	4.4	4.4 Meter Churn	Clause 4.4 reads... “(c) If the Meter Churn has been carried out by a New MP and the metering installation does not have remote acquisition, the New MP must: (i) use reasonable endeavours to contact the Current MP to confirm that a Meter Churn is to be carried out; and (ii) provide the New MP’s details, including its Participant ID. “ This obligation is superfluous as the new MP already has obligations to ensure MSATS is updated and this is the method by which the new MP will use to confirm that the churn had occurred and the new MP’s participant ID. If this is clause is to remain then (i) should be changed to the past tense to reflect clause (c).	This clause has been updated.
11.	United Energy	4.4		Drafting and process needs to be fixed “has been carried out” vs is to be carried out in sub clause (i). (c) If the Meter Churn has been carried out by a New MP and the metering installation does not have remote acquisition, the New MP must: (i) use reasonable endeavours to contact the Current MP to confirm that a Meter Churn is to be carried out; and (ii) provide the New MP’s details, including its Participant ID.	
12.	AGL & Aurora Energy	4.4(c)	Meter Churn	This clause does not have a logical process embedded in it. The clause requires a new MP to contact the old MP to determine whether a meter should be churned, after the meter has been churned. Further, whether the new meter has the inclusion of remote acquisition or not, the old MP may not be aware of the reason for the request. If a customer has rejected comms on a meter, the meter may be churned to support a more efficient manual read process. The old MP may not be aware of this matter and is not responsible for making any decision in this matter.	This clause has been updated.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
				AEMO need to clarify the intention of this clause.	
13.	AGL & Aurora Energy	5	Meter Installation Maintenance	An issue has been raised about an MP's obligations in respect of illegal usage. Given the MP is likely to be the party attending site, it seems reasonable to ensure that they have an obligation to advise financially affected parties if they detect illegal usage. AGL suggests a new section be added 5.4 Illegal Usage If the MP detects illegal usage, the MP should advise the MC and the affected financial parties (eg FRMP, LNSP, LR) as soon as practical. This would also seem an appropriate obligation to place on the MC.	AEMO considers that the MP is required to inform the MC who is responsible for the metering installation, in the event that tampering is suspected and a meter churn is planned. The MC can then determine the appropriate course of action. The current drafting in this section meets this objective. In the event that tampering, or some other form of error or malfunction is determined, the MC must comply with associated provisions within the NER. The procedure does not restrict parties from agreeing to provide and receive notifications in commercial arrangements should they determine that there is a benefit in doing so.
14.	Aurora Energy	5.2	Management of Metering Installation Malfunctions	(a) Where an MP identifies a metering installation malfunction, the MP must advise the MDP and MC within one business day of identification in accordance with clause 7.8.10(d) of the NER At what point is the MP required to contact the FRMP or is this the responsibility of the MC, if so, the specific indication of this can not be found.	The procedure confirms the requirement in the NER for the MP to inform the MC. The MC is the party responsible for the metering installation. In the event that a malfunction is determined, the MC must comply with associated provisions within the NER. The procedure does not restrict parties from agreeing to provide and receive notifications in commercial arrangements should they determine that there is a benefit in doing so.
15.	AGL	6.3	Audits undertaken by AEMO	This procedure requires auditing of the MP function. Similarly, the MDP SLA requires auditing of the MDP function.	Requirements for MCs are in documentation associated with that role (e.g. registration application, guide to the role of the MC).
16.	Aurora Energy	6.3	Audits undertaken by AEMO	This procedure requires auditing of the MP function. Similarly, the MDP SLA requires auditing of the MDP function. Where is the auditing of the MC function, which now includes meter test management, meter installation design and data integrity etc. Would audits be available to the FRMP for those NMI's it is responsible for or would this go through the MC.	Audit reports are provided to the MP who is the subject of the audit. The MP may agree to share that information with other parties.

Table 5 – MSATS Procedures - CATS

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	AGL	General	Multiple locations	Throughout the document the concept of 'site' is used. Where it relates to a physical location – eg address, hazard etc. - that is appropriate. However, using the term 'site' when referring to a CR – eg Create Tier 1 site NMI is not appropriate, as a site can have multiple NMIs, whereas the CR will refer to a NMI. Suggest the term 'site' be removed from these cases.	The word 'Site' appears to be used in a number of contexts. We have deleted the few where we thought it better to refer to a NMI.
2.	Aurora Energy & AGL	General	Multiple Locations	There are several variations on the use of accumulation meters i.e. Basic, Non interval as they all refer to the same a standard definition should be used as per the Glossary – Accumulation Meter	The term 'basic' refers to Datastreams and is embedded as one of the Metering Installation Type Codes, so those five instances cannot be altered. It is also used as a code, so those references cannot be changed. The only reference to 'non interval' has been amended to 'accumulation'.
3.	Aurora Energy & AGL	General	Multiple Locations	Objection Codes – Multiple locations CONTRACT Objection Code should be re-instated for the various CR Codes to cover off the situation where the FRMP does not have an arrangement with the incumbent MC and the incumbent MC objects to the transfer or where a FRMP appoints an MC and the MC objects as there is no contract. The DECLINED code has a different meaning and would apply when roles are being appointed and is therefore not appropriate – e.g. FRMP churn where there is an existing appointment, but no arrangements.	The NER does not provide the MC, MP or MDP with the power to block or delay a retailer transfer in the manner proposed. See also line #26.
4.	CitiPower / Powercor, SA Power Networks *	General	Objection Rules	The proposed removal of objection options depicted in this section not be undertaken for the following reasons: The proposed changes do not meet AEMO stated objective of making 'as	The consultation paper published on the commencement of Work Package 3 clarified the scope of the proposed changes, which included the correction of a number of errors in procedures published in Work Package 1 and Work Package 2.

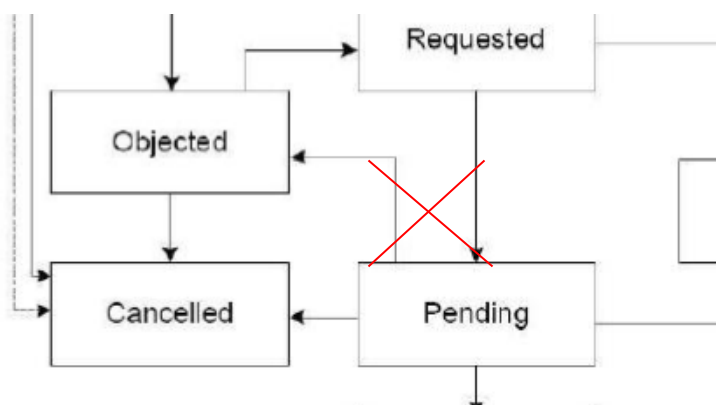
**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
	United Energy			<p>built' changes as per the Notice of First Stage Consultation. We and other participants have not built any of these changes so these cannot be considered 'as built'.</p> <p>Changes to CATS Objection logic are going to have significant ramifications on participants PoC program build effort and testing of systems. Introducing the proposed changes will require participants to introduce scope changes to their PoC projects at a very late stage. Furthermore, participants will be forced to build and complete Industry testing by October 2017 before the Work Package 3 Procedures are even published as Final (at this stage not due to 30th November). This introduces significant project risk across the Industry.</p> <p>The proposed removal of the roles that can use the BADMETER objection codes is not compensated by any corresponding introduction of roles that can use other forms of objection. For example, it is legitimate for an MPB to object to being nominated by a retailer to perform any MPB role if it does not agree to the arrangement. Table 7B does not offer a mechanism for an MPB to object other than via BADMETER. Removing this option removes the MPBs legitimate right not to take on a role if it chooses not to. Arguably, BADMETER is not the right objection code to be using, however many organisation have used what is available over the years and have built their systems accordingly. CitiPower and Powercor and SA Power Networks argue that now is not the time to by making substantial change to these objection codes and that it would be preferable that this change be held off and incorporated into any future Procedure changes post 1st December 2017.</p> <p>To guarantee that the objection rules are truly correct and consistent requires a methodical review of all of the objections rules in the CATS procedures. The adjustments being proposed have not had the benefit of any methodical systemic review and therefore risk introducing unexpected problems and issues at a time of already significant change.</p>	<p>The changes affecting the BADMETER objection code are limited to amending tables in the individual CRs to reflect the unambiguous definition of "BADMETER" which was finalised at the end of Package 1 (published 31 August 2016).</p> <p>If the tables were not amended as proposed by submissions, the effect would be that those codes could only be used as proposed in the table, providing their reason for use also met the unambiguous definition provided in section 4.7. Therefore, the proposed changes to the tables are simply erasing conditions that cannot exist in any case (e.g. an MP could only use 'BADMETER' if they were the MDP, as the description clearly limits its use to the MDP in change retailer requests. As this is impossible, the code could not be used by the MP).</p> <p>Submissions suggested that Table 7B does not offer a mechanism for MPs to not take on a Role. This is not correct. The table specifically allows for the MC to object where either the MDP, MPB or MPC nominated on a change retailer request is incorrect as they are not the party appointed by the MC, or do not have the capability or capacity to operate in the Role proposed. As the MC is responsible for the metering installation and Role appointments, AEMO considers that this is a reasonable mechanism. If a Role is appointed in error, MSATS has the facility for changes to be made retrospectively.</p> <p>Objection codes were reviewed/discussed with participants at a number of industry workshops in 2016 and have been reviewed extensively. Participants have also had many opportunities to review these codes in different rounds of consultation.</p>
5.	Red and Lumo Energy	Various	Objection Codes & Objection Rules	<p>Red and Lumo understand that some participants may be recommending changes to the Objection reason codes. We consider these changes to be outside the scope for an 'as built' consultation and that the issue that they are attempting to rectify can be done post implementation.</p> <p>We strongly object to any changes to the objection codes at this late stage of consultation.</p>	Noted.
6.	Aurora Energy & AGL	General	Multiple Locations	<p>Bad Meter - MPs needs to be able to use that rejection code when a metering installation is not suitable for the requested change – eg Solar installations.</p>	See response to item #4.
7.	Energy Australia	General		<p>EnergyAustralia believes the Objection codes in MSATS have not been sufficiently reviewed and in some cases indicate behaviour contrary to the Rules and intended market operation.</p> <p>For example, a CR6800 allows the old MC to Object on the grounds of Bad Party, despite the fact that they will not have any relationship with the site if the CR completes. And at the same time it does not allow an incoming MC to Object for the same reason, despite the incoming MC being the one who is responsible. (NOTE: if the MC does not change, the existing MC is also the new one, and can object as the "new MC").</p>	<p>Objection codes were reviewed with interested parties at a number of industry workshops in 2016, were the subject of information papers and formal consultation and have been amended based on the new NER framework and consultation as part of PoC Package 1.</p> <p>AEMO disagrees with the suggestions in the example. CR 6800 allows the Current FRMP and Current MC to change multiple roles. The Current MC will not always cease to have a relationship with the site at the completion of 6800 CRs. Where the MC is being changed alongside other roles, the Current MC cannot use the BADPARTY objection code as they are not the appointing MC and as a result cannot determine whether the nominated MDP, MPB or MPC has the capability or capacity to operate in the role proposed.</p>
8.	Aurora Energy	General	Multiple Locations - Objecting party	<p>MP/MDP need to be able to object to MCs they are not contracted to.</p>	Both the MDP and MP roles can use the DECLINED code for the suggested scenario.
9.	Red and Lumo Energy	Various	VICAMI	<p>Red and Lumo recommend that AEMO discuss whether the Victorian Distributors intend to use the code 'VICAMI'. If not, we recommend that it is removed from the Procedures as it is redundant.</p>	This is not an appropriate subject for this consultation. If, after the Victorian Order in Council is made, there is a change in participant behaviour, AEMO will consider whether the code should continue to be available.
10.	Tango Energy	2.2	Financially Responsible Market Participant.	<p>Suggested changes in red.</p> <p>(q)(p) Establish or update the Customer Classification Code within five business days of the NMI Status Code becoming 'A' in MSATS. , where the Customer Classification Code has changed.</p>	The provision is as intended.
11.	AGL	2.3	Local Network Service Provider	<p>2.3(a) is now potentially inconsistent with B2B procedures which require a retailer to raise an Allocate NMI request to an LSNP.</p> <p>Further, as the MC is nominated by the FRMP (or large customer) and the MP/MDP by the MC, it is not possible for an LNSP to create a NMI without a request by the FRMP (Victoria small customers excepted).</p> <p>Suggest this clause be reviewed more broadly.</p>	Where an MSATS Procedure is inconsistent with a B2B Procedure, the B2B Procedure must be amended to align with the MSATS Procedure, not the other way around (see NER 7.17.5 generally – AEMO may object to the publication of a B2B Procedure to the extent that it conflicts with a B2B Procedure).

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
12.	CitiPower / Powercor, United Energy & Origin Energy	2.3(k)	Local Network Service Provider	CitiPower and Powercor and United Energy recommend that clause (k) does not accurately reflect the real situation as the connection point does not move. Proposed wording of this clause could be: Update the NMI Status Code to 'X' within five business days of receiving evidence from the Embedded Network Manager that they have taken full responsibility for the child site.	Upon further reflection, AEMO has decided that this paragraph is redundant and has deleted it.
13.	Aurora Energy	2.4	Metering Data Provider	For metering installations that are manually read, or have been made capable of remote acquisition in accordance with 7.8.9(b) of the NER, update the NSRD within two business days of a meter being read. There is no requirement to maintain the Next Scheduled Read Date NSRD for meters that are remotely read. Unsure why a NSRD is required for a remotely read meter as there is no requirement for them in metrology unless this relates to a T4a meter where the customer has refused Comms.	Altering a type 5 or 6 metering installation to make it capable of remote acquisition does not mean that the metering installation is then treated as a type 4 metering installation (See NER 7.8.9 (b) and 7.8.9 (c)). Accordingly, any type 5 or 6 metering installation that has been made capable of remote acquisition in accordance with this rule must also meet all of the other requirements of a type 5 or 6 metering installation, which includes maintenance of an NSRD. AEMO considers that VIC AMI metering installations will be type 4 metering installations upon the commencement of the amended NER and has presented the rationale for this in responses to submissions in the Package 1 PoC procedure change process.
14.	EnergyAustralia & AGL	2.4(p)	Metering Data Provider	It is unclear why this change has been made. It does not appear to be directly related to PoC and the implications are unclear. EA recommend the change does not go ahead.	If a statutory instrument is passed subsequent to this consultation with alternative arrangements for metering competition implementation in Victoria, the impacts of such an instrument will be assessed once it is published.
15.	Ausgrid Business Services	2.4	Local Network Service Provider	ABS contends it is impractical to provide NSRD updates for metering installations that have been made capable of remote acquisition in accordance with 7.8.9(b) of the Rules following each reading event. Currently, the publishing of the NSRD for these metering installations is inline with the reading schedule that would have been employed had the metering installation been read manually. Suggested re-wording:- Clause (p):- For metering installations that are manually read, update the NSRD within two business days of a meter being read. Add New Clause: For metering installations that have been made capable of remote acquisition in accordance with 7.8.9(b) of the NER, update the NSRD inline with the reading schedule that would have been employed had the metering installation been read manually. Note: A similar provision will be required for VICAMI where there is an expectation the NSRD will continue to be managed in MSATS.	
16.	AusNet Services	2.4(p)	Metering Data Provider	Meters made capable of remote acquisition in accordance with 7.8.9(b) of the NER may be read daily and classified with the read type code of RWD to signify this. In this case it would be unnecessary to update the NSRD on a daily basis. AusNet Services believes the NSW metering fleet installed under 7.8.9(b) is read on a daily basis, and there is potential for Victoria to amend 7.8.9(b) to make it apply to VIC AMI meters to achieve outcomes. To enable these policy outcomes to continue we strongly recommend not incorporating the proposed change as shown below with the red strikethrough (draft procedure changes are in orange). (p) For metering installations that are manually read, or have been made capable of remote acquisition in accordance with 7.8.9(b) of the NER, update the NSRD within two business days of a meter being read. There is no requirement to maintain the Next Scheduled Read Date NSRD for meters that are remotely read. Alternatively, we propose adding a provision to that excludes daily read meters from the requirement from updating NSRD by making the following amendment shown in green. (p) For metering installations that are manually read, or have been made capable of remote acquisition in accordance with 7.8.9(b) of the NER and are not being read daily, update the NSRD within two business days of a meter being read. There is no requirement to maintain the Next Scheduled Read Date NSRD for meters that are remotely read.	
17.	Tango Energy	2.4(m)	Metering Data Provider	Where the ADL has not been entered into MSATS, obtain the ADL from the FRMP or LNSP and update MSATS.	The provision has been improved along the lines suggested.
18.	CitiPower / Powercor	2.5(h)	MPB	Clause (h) should clarify the use of the Meter Status Code "D" (remotely de-energised). The following wording is proposed in a new clause:	The provision has been improved along the lines suggested.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
	& United Energy			Update the Meter Status Code to 'D' within five business days of the meter being remotely de-energised by the MPB. The Proposed Change Date shall be the day after the remote de-energisation. This code must only be used for remotely read interval meters	
19.	AGL & AusNet Services	2.10	Embedded Network Manager	There needs to be a consistent obligation to 2.3(a) regarding creation of a NMI by an ENM when requested by a retailer. An ENM should not create a market NMI without a request from a retailer.	AEMO agrees that both 2.3 (a) and 2.10 (b) can be improved. Procedure has been updated.
20.	CitiPower / Powercor, United Energy	2.10(p)	Embedded Network Manager	CitiPower and Powercor and United Energy recommends that clause (p) does not accurately reflect the real situation as the connection point does not move. Proposed wording of this clause could be: Update the NMI Status Code to 'X' within five business days of receiving evidence from the LNSP that they have taken over full responsibility for the site.	Upon further reflection, AEMO has decided that this paragraph (and clause 2.3(k), its corollary) is redundant and has deleted them.
21.	Ergon Retail	3.5 (b)	Change request life cycle	 <p>Please amend the diagram to remove the arrow from 'pending' to 'objected'</p>	Agreed.
22.	Select Solutions	4.2	Change Reason Code	Table 4-A – Change Reason Codes CR 6300 can be initiated by New MC or Current FRMP	Agreed. Procedure Updated.
23.	AusNet Services	4.7	Objection Codes	AusNet Services is concerned that proposed changes remove the possible use of BADMETER objection codes for a number of transactions, when we and other participants have already built system logic to use this objection code. Further, the use of BADMETER is important for advice where the meter is missing or not fit for the purpose of measuring consumption for the site. Accordingly, we recommend not proceeding with proposed changes restricting the use of BADMETER from MSATS Procedures: CATS Procedures.	See AEMO response to item #4.
24.	CitiPower / Powercor	2.5(a), 2.4(k) & (q), 3.4(e), 4.2, 7.5(a), 8.5, 9.5(a),13.4(c), 18.4(f), 14.4(c), 15.4(c), 16.4(e), 17.4(g), 18.4(e), 19.4(e), 21.4(c), 22.4(d), 22.4(e), 23.4(c), 23.4(d), 23.4(e), 40.4(e), 40.4(g)	ENM Requirements	As per the recommendations in the Glossary, CitiPower and Powercor recommends the current wording of the below terms should be updated to: MDM Contributory Suffix (for each register) NMI MDM Suffix (at least one)	Full review of use of these terms as used in procedures will need to be done before changes can be made – please raise in further consultation as AEMO proposes to make no change at this time.
25.	AGL	Objection Code – BADPARTY	Multiple Locations in document	Changing the ability of some roles to no longer be able to use this Objection Code has not been compensated for with another change – such as the CONTRACT one - which allows an MP/MDP to object to being nominated.	Please refer to AEMO's responses to comments regarding the specific objection codes. See lines #3,4, 26 & 30.
26.	Active Stream	4.7	Objection Codes	Suggest rewording of the CONTRACT objection code to allow Small or Large NMI Participants to object due to commercial agreements, not only Large.	AEMO considers that there are other mechanisms via which the MC for a small NMI can object. As the consultation for the definition of the codes was completed in August 2016, AEMO proposes to make no change at this time.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE																						
27.	AusNet Services	4.7	Objection Codes	Also we suggest that the definition of CONTRACT objection code is extended to also include the situation where a FRMP (not just the large End User) proposes to transfer a NMI but the MC objects on the basis that the FRMP has no arrangement in place with the MC (incumbent or new).																							
28.	Tango Energy	4.7	Objection Codes	Suggest the following rewording: CONTRACT Used by the Current MC where the Current MC is appointed by a Large End User, the Current MC is within contract and a change of MC is proposed.	AEMO agrees that the grammar could be improved without changing the meaning or intention of the definition and has proposed amendments accordingly.																						
29.	United Energy	4.7	Objection Codes	CONTRACT - This definition of contract is too restrictive. It does not allow its use by an Initial MC in Victoria to object to an MC role change on the basis of the Initial MC contract enforcing Victorian Orders in Council. Following wording recommended: Must only be used where an existing contractual (or jurisdictional) obligation takes precedence over the proposed change and OR a change of MC is proposed and the Current MC has been appointed in the Role of MC by a large End User.:	Regarding any potential Victorian order in council; any such instrument will be considered by AEMO following publication.																						
30.	Simply Energy	4.7	Objection Codes	BADPARTY– The definition of this objection code requires further a FRMP to be able to use this objection code as well (in accordance with the objection logging in CR 6300/6301)	The rule allowing the Current RP/MC to object using 'BADPARTY' objection code has been removed from CR 6300/6301 as it does not align with the definition of 'BADPARTY' objection code. A rule has been added to allow the New RP the ability to object to its appointment using "DECLINED" objection code.																						
31.	Tango Energy	4.7	Objection Codes	NOTAWARE Used by the Current LNSP when no communication has been received from any of the ENM, FRMP, or the EENSP regarding making one of their NMIs a Child NMI. Does this objection still apply if the NMI is now being made extinct?	Agreed. Procedure updated.																						
32.	ActewAGL	4.9	NMI Classification Codes	Fix up table 4-E (alignment of values and alphabetical) as per below example to make the table clearer. <table border="1" data-bbox="736 1129 1240 1675"> <thead> <tr> <th>Code</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>EPROFILE</td> <td>External profile shape</td> </tr> <tr> <td>GENERATR</td> <td>Generator</td> </tr> <tr> <td>INTERCON</td> <td>Interconnector</td> </tr> <tr> <td>SAMPLE</td> <td>Sample Meter</td> </tr> <tr> <td>LARGE(1)</td> <td>ACT NSW SA VIC QLD TAS</td> <td>>=160 MWh >=100 MWh >=150 MWh</td> </tr> <tr> <td>SAMPLE</td> <td>Sample Meter</td> <td></td> </tr> <tr> <td>SMALL(1)</td> <td>ACT NSW SA VIC QLD TAS</td> <td><160 MWh <100 MWh <150 MWh</td> </tr> <tr> <td>WHOLESAL</td> <td>Wholesale Transmission Node Identifier</td> <td></td> </tr> </tbody> </table>	Code	Description	EPROFILE	External profile shape	GENERATR	Generator	INTERCON	Interconnector	SAMPLE	Sample Meter	LARGE(1)	ACT NSW SA VIC QLD TAS	>=160 MWh >=100 MWh >=150 MWh	SAMPLE	Sample Meter		SMALL(1)	ACT NSW SA VIC QLD TAS	<160 MWh <100 MWh <150 MWh	WHOLESAL	Wholesale Transmission Node Identifier		Agreed.
Code	Description																										
EPROFILE	External profile shape																										
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SAMPLE	Sample Meter																										
LARGE(1)	ACT NSW SA VIC QLD TAS	>=160 MWh >=100 MWh >=150 MWh																									
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WHOLESAL	Wholesale Transmission Node Identifier																										
33.	CitiPower / Powercor	4.11.1	NMI Status Codes Table 4-H – NMI Status Codes	CitiPower and Powercor seeks clarification from AEMO about the likely use of NMI Status Code 'N'. Can AEMO please confirm the use of this status is limited to ENM's?	'N' NMI Status Code is used when a child connection point is no longer settled in the market. It only applies to child connection points and therefore is only relevant to ENMs.																						
34.	United Energy	4.11.1	NMI Status Codes	UE understands that with AEMO's clarification of embedded network responsibilities that the NMI Status Code 'N' is now redundant and there is no situation where it needs to be used. UE is of the view that it should therefore be removed from the procedures to avoid confusion.	'N' NMI Status Code is used when a child connection point is no longer settled in the market but it can be changed back to 'A' when and if the customer decides to be part of the market again.																						

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

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35.	AusNet Services & AGL	4.11.1	NMI Status Codes	AusNet Services considers that the “Code X” this should also apply when the Embedded Network Connection has been permanently removed from the Embedded Network Connection Point, to be consistent with arrangements outside of the embedded network.	Agreed. Procedure updated.
36.	Tango Energy	4.11.2.	Datastream Status Codes	DataStreamType must be I or P (P – Sample meters only) DataStreamType must be C There is no explanation of DataStreamType. Suggest there is a section and appropriate table to explain and define the use of DataStreamType.	This information can be found in Standing Data for MSATS document.
37.	Vector AMS & AGL	4.11.2(d)- (e)	Datastream Status Codes	It appears that clauses 4.11.2(d) and 4.11.2(e) are under the wrong clause. 4.11.2 is discussing Data Stream status code but (d) and (e) discuss Metering Installation Type Code and how these effect other fields – DataStream Type, filename and Datastream Suffix. These two clauses look a better fit in 4.12.	Agreed.
38.	AGL	4.11.3	Meter Register Status Codes	The definition for D needs to be re-named and amended as this code applies to Meter Registers, not Meters – a meter may have one Register disconnected and another Register left Active (eg load on, controlled load disconnected). D – Register Disconnected D – ‘Applies when the register of a meter is disconnected.’ This also applies to Codes C & R – which apply to Registers not Meters. C - ‘Applies when the Meter Register at a Meter is current and not disconnected’ R – ‘Applies when the Meter Register at a Meter is disconnected.’	The Meter Register Status Code is defined in the Glossary and Framework as a code used in MSATS to delineate the status of a meter. The status codes for the registers are defined in section 4.11.4.
39.	Aurora Energy	4.11.3	Meter Register Status Codes	The definition for D needs to be amended as this code applies to Meter Registers, not Meters – a meter may have one Register disconnected and not another Register (e.g. load on, controlled load disconnected). A meter can also be disconnected at the meter which may not be remote i.e. Type 4a D – ‘Applies when the register of a meter is disconnected.’	
40.	Simply Energy	4.11.3	Meter Register Status Codes	The definition for D needs to be amended as this code doesn’t cover manual disconnections by MPB at a meter level. Simply Energy proposes below: D – Applies when a meter at the NMI is disconnected in accordance with Clause 7.3.2 (i) of the NER. This will allow appropriate use of the above code in situations where meters might need physical disconnections and can be arranged by the FRMP (in certain circumstances, e.g. MRAM) instead of MC to avoid breaching the NER clause above.	Manual disconnections by MP are not permitted under the rules (See NER 7.3.2 (i)(2)).
41.	Jemena	4.12	Metering Installation Type Codes	VICAMI definition conflicts with draft Victorian Government Order in Council (OIC): Draft OIC - A relevant metering installation that, but for it being capable of remote acquisition, would be a type 5 or type 6 metering installation, is taken to be a type 5 or type 6 metering installation On this basis Jemena will be retaining the metering installation type code of MRIM in MSATS. Please remove VICAMI Metering Installation Type Code and associated references in CATS Procedure e.g. Table 4-N Valid Combinations of Read Type Codes, Metering Installation Type Codes and Change Reason Codes.	The VICAMI code cannot conflict with an instrument that has yet to come into existence. AEMO will consider any jurisdictional instrument at the point at which it is published.
42.	AGL	4.13	Read Type Codes	ER – Estimated Read This was the subject of a recent AEMC consultation and the significant impacts on incumbent parties was discussed at length. It is not appropriate to use the ER code only when the customer agrees. This use of this process impacts the current and future financially affected parties at a site (including the FRMP, network and Local Retailer) and should only be used if all financially affected parties agree.	This procedure sets the framework for the use of an estimated reading where it is permitted. Accordingly, no changes are required to the procedure. Note that this requirement is consistent with the current MSATS procedures.
43.	AGL	4.18 (b) (iii)	Embedded Network Codes and Rules	See also clause 2.10 ENM – clause (e) There are no timeframes associated with the LNSP obligations, although the ENM has 5 b/days to provide an EN Name.	Comment noted. If the lack of timeframe proves to be an issue, this topic will be revisited. AEMO proposes no change to the procedure at this time.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
44.	Origin Energy	4.18 (b) (iii)	Embedded Network Codes and Rules	Outlining a timeframe when the LNSP must liaise with ENM will keep the procedure consistent.	
45.	Ausgrid Business Services	4.18 (b) (iii)	Embedded Network Codes and Rules	Disagree. ABS contends the original wording should be maintained and the obligation to develop the Embedded Network Code should be on the embedded network owner.	AEMO cannot impose obligations on an embedded network owner as it is not a Participant. Hence, the obligation will remain on the LNSP to ensure that the obligation is met.
46.	United Energy	4.18 (b) (iii)	Embedded Network Codes and Rules	UE support the AEMO amendments. No change required.	Noted.
47.	Ausgrid Business Services	4.18 (c)	Embedded Network Codes and Rules	Disagree. ABS contends the provision of the parent NMI, the Embedded Network Code and the start date should be sufficient. The remaining information is already available in MSATS.	There are scenarios where the Parent NMI has not been created in MSATS when this request is received by AEMO. This change is to cater for such scenarios.
48.	Endeavour Energy	4.18 (c)	Embedded Network Codes and Rules	Procedural improvement: The LNSP should be obligated to provide the Parent NMI instead of the DLF and TNI. This will allow AEMO to identify the DLF and TNI and later allow for easier identification of when the DLF or TNI requires updating due to changes on the parent NMI. We note that AEMO stated that the intent of providing the DLF and TNI is to "... allow the ENM to get this information from the C1 report". We suggest that a better option would be for the C1 report to obtain this information directly from the Parent NMI.	It's noted in the procedure that these values are only required in this initial transaction. LNSPs are not required to update AEMO with subsequent changes via this transaction.
49.	AGL	4.18 (f)	Embedded Network Codes and Rules	It is not clear why the EENSP is relevant to AEMO – unless they are neither a market or B2B participant, as they are registered with the AER. There is no obligation on the ENM in maintaining this information. If an EENSP changes, there is no obligation to update AEMO.	The identity of the EENSP is required as part of NMI Standing Data for a child connection point. As noted by AGL, the EENSP is not a market participant. Given that the EENSP is the party that appoints the ENM, the ENM is best placed to provide AEMO with this information.
50.	Active Stream	7.4(d), 9.4(d)	FRMP Requirements	The new FRMP must: and the field it must populate is the NEW RP. Recommend that clarification is provided that the New RP may also be the Existing RP, if there is no change of RP role.	Agreed. A footnote has been added to the procedure to provide clarification.
51.	Tango Energy	7.5.	MDP Requirements	Paragraphs (e) & (f) should be combined as a single point.	Agreed.
52.	AGL, Aurora Energy & Vector AMS	7.8 & 8.8	Objection Rules	CONTRACT Objection Code should be re-instated for the various CR Codes to cover off the situation where the FRMP/MC (as applicable) does not have a contract with the incumbent MC/MP/MDP (as applicable) and the incumbent MC/MP (as applicable) objects to the transfer or where a FRMP appoints an MC and the MC/MP/MDP (as applicable) objects as there is no contract between them.	The NER does not provide the MC, MP or MDP with the power to block or delay a retailer transfer in the manner proposed.
53.	Simply Energy, AGL & Aurora Energy	7.8 & 8.8	Objection Rules	Table 7-B Proposed definition of CONTRACT would apply to small and large NMIs, and the CR 10xx tables would need to be updated.	The changes proposed to the 'CONTRACT' code definition are as a result of the issues highlighted in the AEMO information paper published on 12 May 2017, and as described in the Package 3 consultation paper. Changes to the tables in the procedure are to align the tables with the amended definition. AEMO recommends that interested parties review responses to submissions raised in the PoC Package 1 procedure consultation regarding the definition and use of objection codes in MSATS.
54.	AusNet Services	7.8	Objection Rules	AusNet Services recommends retaining the MPB's and LNSP's right to use BADMETER. As the use of BADMETER is appropriate for CR1000 transactions where the meter is missing or not fit for the purpose of measuring consumption for the site and also it is too late to change our systems that incorporate the use of this code at this late stage.	Please see AEMO's response to comment # 4.
55.	Endeavour Energy	8.8	Objection Rules	Procedural improvement: We note that it is now mandatory for the Read Type Code to be populated in CR 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028 and 1029, therefore we suggest that the Current and New MDP should be allowed to object using BADMETER for these change requests.	AEMO agrees that whilst it is unlikely that an MDP would need to use BADMETER for these CRs, it is technically possible and the use of the code for these CRs would be wholly consistent with the definition of the objection code. The procedure has been updated accordingly.
56.	Ergon Retail	10.4 (c)	MDP Requirements	Suggest that it should be change to " within 2 days of reading or installing the meter..."	AEMO considers that for the purpose of the 1500 CR, MDPs are only able to confirm the actual change date on receipt of a meter reading. The installation of a meter is not within the control of the MDP.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
57.	Ausgrid Business Services	17.4 (d)	MPB Requirements	Delete 'Meter Register Status Code' Insert 'Meter Status Code' This information related the the meter record, not the meter/register record.	The Meter Register Status Code is defined in the Glossary and Framework as a code used in MSATS to delineate the status of a meter. (i.e. the status code of the meter on the meter register). The status codes for the registers are defined in section 4.11.4.
58.	Endeavour Energy	17.4.d	MPB requirements	Procedural improvement: This clause is about obligations related to the meter record, therefore the field called 'Meter Register Status Code' should be 'Meter Status Code'.	AEMO proposes to retain the current wording.
59.	Ausgrid Business Services	17.4 (new)	MPB Requirements	A similar clause to clause (d) is required to identify the need to update other mandatory information where it does not already exist (eg Network Tariff Code and NMI Suffix).	Agreed. Clause e has been added.
60.	Ausgrid Business Services	23.4 (e)	MDP Requirements	'MDM Contributory Suffix' should read 'NMI Suffix'	See response to item #24.
61.	Simply Energy	24.2	Conditions Precedent	CI (c) - need to allow for meter to change from COMMS4 to MRAM, under certain circumstances (newly moved-in customer request for e.g.).	Meter changes are irrelevant to this CR. This CR already adequately captures all scenarios in which it could be applied and does not require further elaboration.
62.	AGL	24.2	Conditions Precedent	CI (c) - If the meter is capable of remote acquisition then why is an NSRD update required ? Also, need to allow for a meter to change from 4 to 4A, when a remote meter has been made incapable of remote acquisition as a result of customer refusal of communications or re-enabled at a later date.	AEMO notes that the installation of a type 4A metering installation is strictly limited and does not include a new customer request for such a metering installation, or a refusal following the installation of a type 4 small customer metering installation. With regard to the requirement for an NSRD, see response to item #13.
63.	Aurora Energy	24.2	Conditions Precedent	(c) The metering installation is manually read, or has been made capable of remote acquisition in accordance with 7.8.9(b) of the NER Why do you need a NSRD for a meter that has remote acquisition?	
64.	Red and Lumo Energy	24.2	Conditions Precedent	We consider that this should also explicitly cover off type 4A meters (which are manually read). (c) The metering installation is manually read (including where that meter is covered under 7.8.4 of the NER), or has been made capable of remote acquisition in accordance with 7.8.9(b) of the NER.	
65.	Ausgrid Business Services	24.7	Change Request Status Notification Rules	Add 'LR' to the Complete notification rules. The local retailer must be advised of any NSRD updates.	As this issue was raised during Work Package 1 consultation, please refer to Section 4.3 of Work Package 1 Final Report and Determination.
66.	AGL	30 (deleted clause)	Make NMI a child NMI	There is some debate that this functionality may be required for for error correction and potential retrospective changes. It ceretainly should not be available for new child NMIs post 1 December.	The CR is no longer appropriate under the new NER framework. Networks that are created without an ENM will not have NMIs registered in MSATS from 1 Decemer 2017.
67.	Red and Lumo Energy	30 (deleted clause)	Make NMI a child NMI	We do not agree with this change, as this may be required for error corrections and retrospective changes required for existing sites pre 1st December. This change is out of the scope of an as built consultation.	AEMO will allow for the functionality to be retained for a period of up to 1 May 2018 to enable retrospectivity for error corrections prior to 1 December 2017. AEMO notes that historic use of error corrections in this scenario suggests that use after 1 December 2017 is likely to be limited.
68.	United Energy	30 (deleted clause)	Make NMI a child NMI	UE does not believe that deletion of this clause is prudent whilst the possibility exists that new embedded networks can be created that are exempt from having an ENM appointed (refer to NER 2.5.1), or while there is a possibility that there needs to be corrections made to existing Embedded Network arrangements.	
69.	Active Stream	32.1	Application [6300 6301]	The New MC , current and incoming FRMP should be able to use this CR63XX. This will be compliant with the below clause Clause 7.8.9 (e) states:	Matters regarding role change have been extensively covered in a combination of information papers, consultation papers and responses to submissions. AEMO maintains that this change is not warranted. The manner in which MSATS is to be used by Participants achieves the objective stated in NER 7.8.9(e).

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
				<p>(e) The <i>Market Settlement and Transfer Solution Procedures</i> must include provisions that enable:</p> <p>(1) an <i>Incoming Retailer</i> to nominate a <i>Metering Coordinator</i>, <i>Metering Provider</i> or <i>Metering Data Provider</i> to be appointed at a <i>connection point</i> in respect of which it is the <i>Incoming Retailer</i>, and for those appointments to be recorded as being effective on or, where requested by an <i>Incoming Retailer</i>, after the day that the <i>market load</i> at the <i>connection point</i> transfers to the <i>Incoming Retailer</i> as the new <i>financially responsible Market Participant</i>; and</p>	
70.	Red and Lumo Energy	32.3	Initiating Roles	<p>Red and Lumo understand that some participants may be recommending changes to the CR 6300 that removes the MC . We consider these changes to be outside the scope for an 'as built' consultation and that the issue that they are attempting to rectify can be done post implementation.</p> <p>We strongly object to any further changes to the roles that can initiate at this late stage of consultation.</p>	Noted
71.	AGL	32.3	Initiating Roles	<p>An MC has no right to appoint themselves to a NMI. They can only be appointed by the FRMP (or large customer). As such, AGL is concerned that MCs can appoint themselves to NMIs. There is no visibility to other participants to indicate why such a change would be made by the MC and therefore it is expected that every CR 63xx raised by an MC will be objected to by the FRMP and incumbent MC unless prior communication had taken place.</p> <p>If such communication had taken place, then the FRMP could raise the CR 63xx, as it is expected that the FRMP will raise those CRs on behalf of customers appointing MCs as there are additional FRMP / Customer contractual changes required in these circumstances to support that appointment.</p>	<p>The conditions under which an MC may be appointed are clear in the NER and include the ability for the MC to be appointed by a large customer. An MC may also have an agreement with a Current FRMP in which the MC raises CRs in MSATS on the FRMP's behalf.</p> <p>In both of these situations, AEMO considers that it is appropriate for the MC to be able to raise this CR.</p> <p>Should a CR be raised in error, MSATS can be amended retrospectively.</p> <p>AEMO notes that the MSATS procedures do not prevent parties from communicating their intent to any affected party prior to raising a CR, and that, as is the case for all CRs, the objection process is not established to prevent a party from breaching a rule.</p>
72.	Origin Energy	32.3	Initiating Roles	<p>Only a FRMP can initiate a CR to change the MC. This section states that the MC has the ability which impacts retailer visibility of roles as well as having potential contract issues with customers. Also note, there is a draft rule change being developed to address this issue.</p>	
73.	United Energy, Simply Energy & Active Stream	32.3	Initiating Roles	<p>This section requires more thorough review.</p> <p>An MC has no right to appoint themselves to a NMI other than when the MC is appointed by a Large customer.</p> <p>In 32.2 the Initiating roles needs to reflect the New MC restriction to Large customer appointment.</p> <p>The section wording only mentions the MC requirements in 32.4 there are no equivalent FRMP requirement for initiating this CR. Greater clarity in the requirement of the FRMP is requirements. (For example the FRMP may only nominate an MC where an agreement exists between the FRMP and the MC)</p>	Agreed. Procedure has been updated.
74.	Active Stream	32.3	Initiating Roles	<p>The MC will have an understanding (signed or deemed contracts in place with the FRMP) and only those 2 parties know the details of that arrangement. If the FRMP nominates another MC it is clear that they are terminating the agreement for that NMI with the current MC.</p> <p>How does a current MC determine that a FRMP has asked another MC to become the Participant for the NMI- if the incoming MC just nominates itself as the MC? If a current MC needs to clarify the situation for each small NMI – there possibly could be objections adding further delays to the churn process.</p> <p>Clause 7.6.2:</p>	Please see comment #73 and AEMO's response.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

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				<p>7.6.2 Persons who may appoint Metering Coordinators</p> <p>(a) A Metering Coordinator may only be appointed:</p> <p>(1) with respect to a <i>connection point</i> or proposed <i>connection point</i> on a <i>transmission network</i>, by the <i>Market Participant which is financially responsible at the connection point</i>;</p> <p>(2) with respect to a <i>connection point</i> (other than the <i>connection point</i> of a <i>retail customer</i>) that connects, or is proposed to connect, a <i>generating system</i> to a <i>distribution network</i>, by:</p> <p>(i) the <i>Market Participant</i> which is <i>financially responsible at the connection point</i>;</p> <p>(ii) a <i>Non-Market Generator</i> who owns, controls or operates the <i>generating system</i> that is connected to the <i>distribution network</i> at the <i>connection point</i>; or</p> <p>(iii) a person who owns, controls or operates the <i>generating system</i> that is connected to the <i>distribution network</i> at the <i>connection point</i> and is exempt from the requirement to register as a <i>Generator</i> under clause 2.2.1(c); and</p> <p>(3) with respect to any other <i>connection point</i>, by:</p> <p>(i) the <i>Market Participant</i> which is <i>financially responsible at the connection point</i>; or</p> <p>(ii) the large customer whose premises are supplied at the <i>connection point</i>.</p> <p>(b) A person making an appointment under paragraph (a) must do so in accordance with the <i>Rules</i> and procedures authorised under the <i>Rules</i>.</p>	
75.	CitiPower / Powercor, United Energy	32.4	MC Requirements	Clause (c) should have a RP field added to allow the initiator to identify who the new MC is.	AEMO has not been able to identify any material benefit of making the change proposed. The FRMP could only raise the CR legitimately if they had established an arrangement with the MC in which the FRMP could appoint the MDP on the MC's behalf.
76.	Tango Energy	32.6	Objection Rules	For CR6300, for the objection of CONTRACT there is no entry in the Jurisdiction column.	Noted and corrected.
77.	Active Stream	32.6	Objection Rules	<p>BADPARTY – is not appropriate for cr63xx.</p> <p><small>BADPARTY Used by the MC when the MDP, MPB, or MPC nominated on a change retailer request is incorrect as they are not the party appointed by the MC, or do not have the capability or capacity to operate in the Role proposed.</small></p> <ul style="list-style-type: none"> • Earlier in the year it was recommended to AEMO via email that there are no 'fit for purpose' objection codes to be used for the basic objections by contestable Participants – Not including DECLINED. However this is inappropriate in instances as the Participants may still want to accept the CR but the initial request may have not been as per terms of agreement. • Declined is also not an option in the impacted Objection Rules Tables. • The closest fit would be the below but it would also require tweaking of their description. <ul style="list-style-type: none"> ○ NOTRESP and/or ○ CONTRACT <p>These objection codes could be applicable to a lot scenarios for the contestable world.</p> <p>It is also recommended that all objection codes and Objection Rules are reviewed to align with the Procedure and Industry updates with respect to POC. If we do not have appropriately defined/aligned Objections for each CR, where is the benefit of having a Table of Objection Codes, which deliver no value?</p>	<p>AEMO agrees that the BADPARTY objection code is not valid for this CR and has removed it.</p> <p>Objection codes were reviewed with interested parties at a number of industry workshops in 2016, were the subject of information papers and formal consultation and have been amended based on the new rules framework and through procedure consultation as part of PoC Package 1.</p> <p>AEMO agrees that the DECLINED objection code is valid in the context of this CR and proposes to include it in the procedure.</p>
78.	CitiPower / Powercor & SA	32.6	Objection Rules	CitiPower Powercor strongly recommends the objection code of BADPARTY also be made available for use to the new RP (if nominated by a FRMP to be an MC).	

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
	Power Networks			In line with the proposed change of allowing the FRMP to nominate the new RP (MC) using 6300 CR, the new RP also requires an objection code to use if it has been nominated in the role but wants to object to this nomination (i.e. a FRMP assigning the LNSP as the RP for a site with usage above 160MWh).	
79.	United Energy	32.6	Objection Rules	Elsewhere UE has recommended that there be no change to objection code logic. However in this case, UE recommends the objection code of BADPARTY also be made available for use to the new RP/MC if nominated by a FRMP. As the Procedure currently stands the new RP/MP does not have an objection code to use if it has been nominated in the role but it wants to object to this nomination (i.e. a FRMP assigning the LNSP as the RP for a site with usage above 160MWh).	
80.	Active Stream	32.6	Objection Rules	Suggest that the Ojection code 'CONTRACT' be reworded to allow for all contractual agreements post 1 DEC 2017, not only for LARGE NMIs. This would allow for the new MC to object if they do not have contracts in place with FRMPs etc. This would allow more precise and informative objections for Participant communication.	See AEMO's response to item #53.
81.	Ausgrid Business Services	32.6	Objection Rules	ABS contends there is a need for the New MC to be able to object to their appointment for all change request types – Regardless of the NMI Classification.	
82.	Vector AMS	32.6	Objection Rules	Table 32-B Objection Codes should cover off the situation where the new MC does not have an arrangement with the incumbent MP/MDP and the incumbent MP/MDP objects to the new MC churn or where a FRMP appoints an MC and the MP/MDP objects as there is no contract between the MC and MP/MDP which would put the parties in breach.	
83.	Active Stream	37.1	Application	The MC , current and incoming FRMP should be able to use this CR68XX. This will be compliant with the below clause Clause 7.8.9 (e). Whilst AEMOs interpretation of the CR10xx enabling it, it only applies to the 'effective on' part of the clause and does not allow the MC, MPB and MDP to mitigate any obligations for which they are not responsible for. It is the most ineffective of all CR to nominate and churn roles as the rules clearly say that the market load must have transferred for a meter churn to be effective. The CR68xx as an optimum option, will enable the "after the day that the market load transfers	The conditions under which an MC may be appointed are clear in the NER. AEMO also refers interested parties to the information provided on this topic in the Information Paper released on 12 May 2017, prior to the commencement of this consultation.
84.	Aurora Energy	37.1	Objection Rules Application [6800 6801]	Used where the Current FRMP or Current MC is required to provide concurrent Prospective Changes to one or more Roles. Request to enable New FRMP/NEW MC to raise these requests as previously discussed at Prior Meter Churn Meeting and previously agreed by AEMO.	
85.	Active Stream	37.3	Initiating Roles	Amend clause (a) to read: A Current or Incoming FRMP may initiate.....	
86.	Tango Energy	37.8	Objection Rules	The objection of CONTRACT should also apply to the 6800 and 6801 for Large customers as the Current MC may still be under contract to the Large customer and a different MC is being proposed in the change request.	Agreed.
87.	Tango Energy	37.9	Change Request Status Notification Rules	Why does the New MC (RP) receive the notification of Rejected when the New MDP, MPB and MPC do not? This highlights the potential inconsistencies in the Change Request Status Notification Rules tables throughout the procedures. It is understood that validation is undertaken at the Pending Validation stage and a notification of Rejection can be received at this time by the Initiating Party. Also, validation may occur at the Requested and Pending stages of the transaction life cycle. Where a notification of Rejected has been issued at the Requested or Pending stage, then all participant roles who have received the Requested and Pending notifications should also receive the Rejected notification.	Upon further reflection, AEMO has removed the New RP's (MC) ability to receive 'Rejected' notification as the New RP (MC) cannot raise this change request.
88.	Endeavour Energy	42	Access to CATS Standing Data	Procedural improvement: Details of the C7 report is not documented in any current AEMO documents. To assist participants with a better understanding of the C7 report we suggest that	Noted. This matter may be considered further in the next iteration of the MSATS procedures and associated documentation.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
				this section defines what data will be provided in a C7 report, who can request a C7 report and any other conditions or rules associated with a C7 report.	
89.	Ausgrid Business Services	New	Maintain Datastream – Change NMI Datastream – MRAM	<p>A new set of change reason codes are required to allow contestable metering data providers to change/update the NSRD for MRAM metering installations only.</p> <p>The only difference between the existing 5070/5071 and the new change requests will be the inclusion of the LNSP in the notification rules for the completed change request.</p> <p>Rationale: The LNSP needs access to a reliable and current source of the NSRD. The NSRD provided in the NEM12 file is current only at the time the MDFF was created. Under the current procedures, the LNSP does not have access to any changes to the NSRD subsequent to the receipt of the NEM12 file.</p> <p>If not implemented, can AEMO please advise how they propose LNSPs obtain NSRD updates?</p>	<p>AEMO suggests that Ausgrid raises this issue through the change process at a later date if it becomes a problem.</p> <p>AEMO notes that a type 4A metering installation will only be installed in exceptional circumstances as provided for in the NER, and that the NSRD is provided to the LNSP in the MDFF as highlighted in the Ausgrid Business Services submission. AEMO recommends that Ausgrid Business Services and other participants consider the materiality of the issue and if necessary, raise the matter through business as usual changes processes.</p>
90.	Ausgrid Business Services	New	Guidelines for Managing Redundant Change of Service Provider Change Requests	<p>A new set of rules are required to manage the cancellation of incomplete change requests nominating a change to MC/MPB/MPC/MDP where the initiating party is no longer responsible for the appointment.</p> <p>Example 1: A retailer raises a change request to appoint an MC with a prospective date. Between the time the change request is raised and the proposed change date, there is a change of retailer. The incomplete change request should be cancelled at the time the retailer change is effected in MSATS.</p> <p>Example 2: An MC raises a change request to appoint an MPB/MPC/MDP with a prospective date. Between the time the change request is raised and the proposed change date, there is a change of MC. The incomplete change request should be cancelled at the time MC change is effected in MSATS.</p> <p>Failure to cancel redundant change requests will lead to unnecessary and unauthorised meter churn.</p> <p>This is an existing problem but has the potential to get worse as more parties are capable of submitting change requests and volumes increase on account of the POC rules changes.</p>	<p>AEMO considers that there may be merit in exploring the issues raised further and suggests that Ausgrid Business Services and other participants consider the materiality of the issue and if necessary, raise the matter through business-as-usual change processes.</p>
91.	Ausgrid Business Services	New	Guidelines for Managing Concurrent Metering Service Provider Roles	<p>A new set of rules are required to manage concurrent change requests managing the appointment of new service providers (MC/MP/MDP) similar to those relating to concurrent retail transfers detailed in Section 6. Like the rules associated with retail change requests, both type 1 and type 2 scenarios need to be managed.</p> <p>Example 1: A retailer raises a change request to appoint an MC and the same MC raises a concurrent change request to appoint themselves. These change requests could have different effective dates.</p> <p>Example 2: A retailer raises a change request to appoint an MC and another MC raises a concurrent change request to nominate themselves – These change requests could have different effective dates.</p> <p>Example 3: A retailer raises change request to change MPB/MPC/MDP and the MC raises a concurrent change request to nominate the same (or different) parties – These change requests could have different effective dates.</p> <p>Failure to validate and cancel concurrent change requests nominating a change to MC/MPB/MPC/MDP could lead to unnecessary confusion and meter exchanges.</p> <p>This is an existing problem but has the potential to get worse as more parties are capable of submitting change requests to change service providers.</p>	<p>AEMO considers that there may be merit in exploring the issues raised further and suggests that Ausgrid Business Services and other participants consider the materiality of the issue and if necessary, raise the matter through business-as-usual change processes.</p>

Table 6 – MSATS Procedures WIGS

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	CitiPower / Powercor	Various	Various	CitiPower and Powercor recommends as per comments in the CATS Procedure the following terms should be updated throughout the WIGS procedure: NMI suffix to 'MDM suffix' MDM Contributory Suffix to 'Suffix'	Please refer to AEMO's response in CATS Procedure.
2.	CitiPower / Powercor, SA Power Networks, United Energy	2.8, 7.6, 16.9,17.6, 21.8	Objection Rules	See response to 7.8 in CATS Procedure	Please refer to AEMO's response in CATS Procedure.
3.	United Energy	20 (old)	Make NMI a child NMI	UE does not believe that deletion of this clause is prudent whilst the possibility exists that new embedded networks can be created that are exempt from having an ENM appointed (refer to NER 2.5.1), or while there is a possibility that there needs to be corrections made to existing Embedded Network arrangements.	Please refer to AEMO's response in CATS Procedure.
4.	Aurora Energy	22.1	Application [6300 6301]	As the CR6300 has been updated in the CATS procedure to allow the FRMP to update the MC role, would it not reflect that the same can occur in the WIGS procedure? Aurora Energy has had reason to do this in the past as a FRMP for a wholesale NMI. We also stand by our current statement on CR6300 in the CATS procedures.	Changes to CR 6300/6301 have been applied to WIGS Procedure.

Table 7 – MDFF Specification NEM12 NEM13

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	Ausgrid Business Services	3.3.4 (f)	Index Read for type 4A and type 5 Metering Installations	ABS contends the original wording should remain, but the words Interval Date should be underlined and italicised as they are reference to the field name in the 300 record. Suggested wording:- "The latest IndexRead only must be provided where more than one IndexRead has been collected on the IntervalDate."	IntervalDate refers to a field name, which appears to be inappropriate in the context of the requirement - the Meter Reading date appears to work as intended.
2.	Ausgrid Business Services	4.3	NMI data details record (200)	ABS contends the new wording does not specifically call-out the population rules for the MeterSerialNumber when providing historic data from a removed meter. Suggested wording:- The Meter Serial ID of the meter from which data for the IntervalDate was collected. Where a meter is replaced and:- <ul style="list-style-type: none"> The NMISuffix remains active, the Meter Serial ID of the new meter on the IntervalDate on which the meter churn took place; or The NMISuffix becomes obsolete, the Meter Serial ID of the old meter on the IntervalDate on which the meter churn took place (ie the Meter Serial ID of the meter from which the data was collected). This should align with the Meter Serial Number in MSATS on the IntervalDate. Not required for type 7 metering installations, logical meters, Historical Data, or where multiple meters are summated to form a single RegisterID. ABS contends the differentiation between the ongoing status (or otherwise) of the NMISuffix is necessary to ensure a link can be established between the interval metering data and the meter/register information in MSATS.	AEMO considers the proposed change regarding NMISuffix status a change that could impact participants' systems and processes and would require consultation with participants before being proposed as a change. Note that this field is not required when providing Historical Data.
3.	Origin Energy	4.3	NMI data details record (200)	Slight changes to Meter Serial number field but don't think it has any impact. Comfortable to remove.	Noted.

Table 8 – Qualification Procedure (MP MDP ENM)

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

#	RESPONDENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE																																																																																																								
1.	Red and Lumo Energy	4	Maintenance of Accreditation and Registration	Recommend including clarification on how often AEMO will request the audits of accredited MDP, MP and ENM performance or how this assessment will be made by AEMO.	As section 4 states, the Service Level Procedures contain further information about scheduled audits.																																																																																																								
2.	AGL	Appendix A	Pre-Reading	Noting that an ENM is responsible for providing 'Embedded Network Management Services' and not metering services, it is unclear why the ENM would be required to be familiar with the various metrology requirements and Service Level Procedures, as shown in the pre-reading checklist. Also, if they are not to be B2B transactionally enabled, the same comment would apply to the majority of B2B procedures (except the NMI creation requirements).	AEMO considers all items in the pre-reading list for the ENM are relevant. Some material may not be directly related the services that the ENM provides, but it provides the background information the ENM is expected to know. For example: Metrology Part B provides the ENM with information on the processing of metering data which the ENM is entitled to receive. We have inserted a footnote where the B2B Procedures are referenced, to clarify that they need only be familiar with those where the ENMs intend to use the B2B e-Hub.																																																																																																								
3.	AGL	Appendix B	Application form	As an improvement suggestion why not make the required contacts a table, identifying the roles, which can be easily filled out, rather than requiring the table to be replicated. Eg <table border="1" data-bbox="724 856 1620 1199"> <thead> <tr> <th>Type</th> <th>Name</th> <th>Position</th> <th>Office eg Head Office or Branch</th> <th>Phone</th> <th>Mobile</th> <th>email</th> <th>Assistant (if applicable)</th> </tr> </thead> <tbody> <tr><td>MD/CEO</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>MD Assistant</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Company Secretary</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Communications Contact</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Registration Contact</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Accounts Receivable (settlements)</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Information Systems – Primary</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Information Systems – Secondary</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Operations – Trading Manager, Bidding Contact</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Operations – Manager</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Procedure Change Committee (PCC) Contact</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Technical Working Group (TWG) Contact</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table> AGL also notes that the various participant application forms have variations on format and details required making completion of multiple forms unnecessarily onerous.	Type	Name	Position	Office eg Head Office or Branch	Phone	Mobile	email	Assistant (if applicable)	MD/CEO								MD Assistant								Company Secretary								Communications Contact								Registration Contact								Accounts Receivable (settlements)								Information Systems – Primary								Information Systems – Secondary								Operations – Trading Manager, Bidding Contact								Operations – Manager								Procedure Change Committee (PCC) Contact								Technical Working Group (TWG) Contact								For readability purposes, AEMO proposes to retain the current format of this section but will consider it in future.
Type	Name	Position	Office eg Head Office or Branch	Phone	Mobile	email	Assistant (if applicable)																																																																																																						
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Table 9 – Other Issues

AEMO acknowledges that a number of comments were made in the submissions about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table.

#	RESPONDENT	DOCUMENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	ActewAGL	B2B Guide	Figure 3	Proposed new Customer Service Sequence for ACT	Plesae update ACT Process Flow in Figure 3 to the one attached in response email.	Passed on to B2B WG
2.	Aurora Energy	B2B Service order process	Table 13	Transactions tables	"Metering Service Works - Change Time Switch Settings" is missing in Table 13 Transaction table and therefore the optionality requirements are missing for that Service order type	Passed on to B2B WG
3.	Ausgrid Business Services	General			ABS contends some of the changes described in this change pack will not be able to be implemented if the final determination is made on 30/11/2017.	Thanks for you comments we understand your concerns and will look to publish as soon as possible.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	DOCUMENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
					ABS would like to see the final determination made no later than 31/10/2017 to allow sufficient time to enable system and process changes to be managed in time for 01/12/2017 go-live.	
4.	Endeavour Energy				Consultation improvement: We note that AEMO's intention is to make the procedure effective from 1 December 2017 however the consultation paper suggests that the final determination will be published by 30 November 2017. This introduces a risk to the Power of Choice program because there would be insufficient time from the date of final determination to the effective start date of the procedures for participants to review, redesign, build and test changes to participant's systems and processes, or updating of contracts. We note that in past consultations there has been significant difference between the draft and final determination therefore to rely on the draft determination may not be an effective mitigation control. We suggest that AEMO carefully consider the impact of any changes that they make so that they do not inadvertently impact on a participant's readiness for 1 December 2017 by either making the changes effective on a date after 1 December 2017 or publishing the final determination much earlier to allow time for participants to make any necessary changes to comply from 1 December 2017.	
5.	Endeavour Energy				Consultation improvement: We note that AEMO published the procedures in zip files on their website on the 19/05/2017 but later replaced the zip files with updated versions of the procedures on their website without any notice to participants. This has caused confusion when reviewing and collating feedback on the procedures because of the different versions that were published without any notice. We suggest that in future AEMO informs participants of any changes or updates to published documents during a consultation period.	AEMO notes the suggestion and will take it on board.
6.	Energy Australia	All			General Scope EnergyAustralia support AEMOs approach to this work package. However, there have been many suggestions for improvements from industry participants leading into this work package. EA support AEMO's stated approach that this Work Package is for minor amendments, "such as corrections to table references and the removal of superfluous text" and specific items which are critical to the functioning of the market post 1-Dec and have been comprehensively discussed in industry forums previously. Although they may be beneficial in and of themselves, EA would be concerned if changes that have not been thoroughly socialised are included in Work Package 3.	Thanks for your comment.
7.	Energy Australia	All			Meter Exchange EnergyAustralia do not believe the obligations and rights associated with Meter Exchanges are clear throughout AEMO Procedures. In particular, it is not clear when an MC is "appointed". Throughout the NER, this appears to be at the point where a contractual arrangement is made, however in metrology part A, section 11.1 it is when MSATS is updated. This item was raised in February 2017 and through recent discussion with different participants it is clear that there is still a variety of different understandings on what the obligations of different parties is, and what rights different parties hold. EnergyAustralia call on AEMO to ensure the Procedures both align with the Rules and meet the practical, intended purpose of supporting an effective and efficient market for metering services in the NEM, which allows efficient transfer of metering roles. Ie, support simultaneously updating all metering roles. Compared with pre-PoC, the proposed approach is more complex and introduces both commercial risk and delay customers receiving advanced metering services.	Thanks for your comment and AEMO welcome participants to call on AEMO for clarification on any elements of the procedures to which they require clarity.
8.	Red and Lumo Energy	NEM Metering Coordinator Registration Guide	-	-	This document needs to be included in relevant AEMO procedures as a reference. This should be updated in the; <ul style="list-style-type: none"> o Guide to Metering Coordinator o Retail Electricity market procedures- Glossary and Framework 	Thank you for your suggestion. These references will be updated as appropriate.
9.	VECTOR AMS	C7 report			C7 report – A registered MC should be able to run a C7 report to determine the metering in-situ at a NMI, regardless of whether they are in a role in MSATS. Current validation rules require MC's to be either proposed (new) or current in MSATS to be able to request a C7 report. As MSAT's is not real-time these validation rules will stop an MC who has been requested to assume the MC role by the FRMP from requesting information about a site until MSATS has processed the related CR. There are legitimate scenarios where this will impact service delivery and timely resolution of metering issues at a customer's site. In extreme circumstances, it may also result in customers left off supply longer than necessary. A worked example: Customer is off supply for metering related issues. Urgent works are required. FRMP decides to engage a new MC to resolve the issue. FRMP contacts new MC instructing them to arrange for MP to attend site. MC wishes to understand nature of existing Metering before accepting job. MC is unable to request a C7 report until CR6300 has been submitted and processed by MSATS. This could be up to 24 hours	Thank you for your suggestion. AEMO do not believe a change is required. The procedures are clear concerning valid participants performing roles in the market and their ability run reports etc. If a FRMP decides to engage a new MC to perform an urgent task then they will need to be mindful of the need for the change requests to be processed by MSATs including the objection logging period and to also take into account the site and the MC/MP capability to perform tasks at site (MC declines due to inability to perform role).

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 3): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

#	RESPONDENT	DOCUMENT	CLAUSE	HEADING/ DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
					after he has been asked to assume MC role. Once CR6300 goes 'Pending' MC runs report but finds metering is such that he does not have contracts with relevant Service Providers e.g. Site is CT, so cannot accept the role. MC rejects assignment. FRMP looks to assign to another MC and process	
10.	Ergon Retail	Meter Churn Procedure for FRMP	-	General comment	This document should be updated to reflect the ability of an RP (MC) to initiate churn (as per Metrology Part A section 11.1)	Meter Churn Procedure for FRMP will be cease to apply from 1 December 2017. The new Meter Churn procedure has been incorporated into Metrology Procedure Part A, which will apply from 1 December 2017.
11.	Ergon Retail	Meter Churn Procedure for FRMP	3.1	Obligations – Initiating Meter Churn	As per comment in 3.2, the RP can initiate churn and the current Procedure currently only covers the FRMP.	As above.
12.	Ergon Retail	Meter Churn Procedure for FRMP	3.2	Obligations – Managing Meter Churn	Requires new details to support obligations of the RP (MC) when initiating churn. The Procedure currently only covers the FRMP.	As above.