

Table 10 – NMI Standing Data Schedule

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	Ergon	2	NMI Standing Data Schedule	Ergon Energy recommends for clarity and accuracy, this section should include a description / explanation of each data element, and be aligned to the NMI attributes -as per the CATS and WIGS procedures.	AEMO does not believe a description of each data element is required in this document. Where applicable, the description of these data elements can be found in the Glossary and Framework document. AEMO does not believe that 'Street Address', 'Time of Day' and 'Unit of Measure' require descriptions.
2.	United Energy			UE support the amendments to include LNSP and TNI Code. In round 1 consultation UE also raised that the NERR customer classifications of small/large customer are also useful for customer quoting purposes and should be considered for inclusion in the NMI Stranding data schedule. These are fundamental for contract type and small customer protection frameworks. AEMO should update the NMI Standing data schedule to include these elements.	The NMI standing data schedule does not define what is in NMI discovery, hence AEMO does not understand the purpose of the request to add customer classifications to the NMI Standing Data Schedule.
3.	United Energy	3.1	Obligations to supply data for the NMI Standing Data Schedule	<u>Embedded Networks</u> AEMO agree that an ENM is not a Registered Participant as defined in NER Ch10 and hence have no obligation to provide the NMI standing data in this clause. Where an ENM is acting like an LNSP for on market children within an embedded network, we understand that the ENM will be responsible for creating the NMI and standing data in CATS and maintaining that data. AEMO should include the ENM in the obligation to supply the NMI standing data consistent with the intent of the ENM rule. Alternatively AEMO should footnote the Registered Participant term used in this clause and acknowledge that it includes accredited and AEMO registered parties such as an ENM also.	Agreed, ENM will be added.
4.	ActewAGL	3.2	Obligations when using the NMI Standing Data Schedule	Need to improve paragraph numbering; (a) Prospective <i>retailers</i> who are also <i>Registered Participants</i> may access the <i>NMI Standing Data Schedule</i> for the purposes of: (i) providing an End User with a quotation or proposal for that End User's supply of electricity while seeking to be the FRMP for that End User's <i>connection point</i> ; (ii) entering a Change Request to change <i>retailer</i> in order to become the FRMP for the End User's <i>connection point</i> ; or (iii) arranging the relevant <i>connection</i> . (b) Registered Participants and others may access the NMI Standing Data Schedule in accordance with the CATS Procedures.	Accepted.
5.	United Energy			AEMO acknowledge that "others" may access NMI standing data and that the access may be included in the CATS procedures. UE note that "others" is a vague term and may not be consistent with the data access provisions in the NER. The use of the data by others is not limited and probably should be in a manner consistent with the prospective retailer obligations of access.	AEMO notes the comments from United Energy. The NER and CATS Procedures state who can have access to NMI Standing Data. "Others" is merely a convenient way of referring to parties other than Registered Participants. To make it clearer that there has to be a legitimate right to the data, we have included a reference to the NER.
6.	AGL	4	Amendments	Note – this is a new section added since round 1 and did not appear in the feedback template. This clause is better suited under after cl 1.1 as it relates to the relevant head of power.	This clause was added as a result of a suggested change from United Energy during the first stage of consultation. Refer to Appendix A, Table 9, comment #1. It relates to amendment which calls up the head of power. AEMO believes this sections should remain as it is.

Table 11 – NEM RoLR Processes: Part A

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

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1.	AGL / Energy Australia	0	General	<p>This procedure does not include the outcome of the MC failing.</p> <p>There is an AER consultation on splitting suspension of parties with multiple registration.</p> <p>This needs further consideration and discussion</p>	<p>AEMO notes the comments from AGL and EnergyAustralia and refers to AEMO's first stage response on this issue. That is, the RoLR procedures should only be addressing the Failed Retailer (FRMP) scenario. While AEMO agrees that an MC could potentially fail, AEMO has no power to issue a binding process to address the consequences of such a failure.</p> <p>If participants require such a procedure, we think that the NER will need to give AEMO a specific power to develop one.</p>
2.	Momentum	0	General	<p>Metering Coordinator Default Notice:</p> <p>As per the Final Rule Change, clause 7.3.3 of NER states:</p> <p>7.7.3 AEMO may issue breach notice</p> <p>(a) <i>AEMO</i> must establish, maintain and <i>publish</i> a procedure for the issue of a <i>Metering Coordinator default notice</i> in respect of <i>Metering Coordinators</i> which incorporates the principles specified in paragraph (b).</p> <p>(b) A breach of the provisions of the <i>Rules</i> or of the procedures authorised under the <i>Rules</i> must be determined against the following principles:</p> <p>(1) the definition of breach must contain three or more levels of severity, the highest level of severity being a 'material breach';</p> <p>(2) the issue of a <i>Metering Coordinator default notice</i> can only occur if it can be demonstrated that the <i>Metering Coordinator</i> has committed a material breach; and</p> <p>(3) the levels of a breach with severity below a material breach are to be treated as warnings with different levels of magnitude.</p> <p>However, nothing has been captured in RoLR process that could get impacted as a result of the above mention event.</p>	<p>This issue is unrelated to the RoLR Process document.</p> <p>The <i>Metering Coordinator Default Notice</i> will be created and consulted on by AEMO with industry participants under Work Package 2 for publication by 1 March 2017.</p>
3.				<p>Also, since Metering Coordinator role doesn't require AEMO Accreditation, Momentum would like to confirm and seek advise from AEMO about the protocols AEMO will use in order to assess that an MC is fulfilling it's obligations and on what basis can "anyone" register to be an MC? Would AEMO be providing a checklist of some sort that can assist potential MCs to ensure they follow the processes? We understand this is a broader issue, and would be happy to discuss further on the same however we would appreciate AEMO's point of view on the above Rule clauses.</p>	<p>This issue is unrelated to the RoLR Process document.</p> <p>Any relevant guidelines, protocols and checklists relating to MC registration will also be developed by AEMO under Work Package 2 for publication by 1 March 2017.</p>
4.	United Energy	1	Introduction	<p>UE note Origin's comments relating to changes to ROLR – Part B and AEMO's response. The ROLR – Part B should be updated by AEMO and presented to the first IEC meeting in September 2016 so the set of NEM RoLR processes can be finalised in 2016.</p>	Noted.
5.	AGL	2	Summary of ROLR Processes	<p>General comment:</p> <p>Review for MC/MP/MDP obligations when the RoLR has not contracted the MC.</p> <p>At the appointment of the RoLR the sites are transferred to the RoLR, and therefore the RoLR could initiate meter churn if necessary.</p>	<p>The ROLR procedures are only addressing Failed Retailer (FRMP) scenario, meter churn process is irrelevant in the context of the ROLR procedure.</p>
6.	Energy Australia			<p>How will the rules account for Review for MC/MP/MDP obligations when the RoLR has not contracted the MC?</p>	<p>AEMO considers that the requirements for performing in the role of MC, MP and MDP are sufficiently clear in the NER.</p>
7.	AGL	2(c)	Summary of ROLR Processes	<p>Review meaning of clause:</p> <p>(c) Management of in progress Service Orders associated with the <i>NMIs</i> the Failed Retailer was financially responsible for by the:</p> <p>(i) Failed Retailer.</p>	<p>The service orders in the ROLR procedure are considered only in Part B of the procedure. The IEC is the body responsible for approving changes to Part B. Therefore, AEMO does not have the power to make any changes to Part B outside of the IEC process and won't be making any comment on the suggested changes to Part B.</p>

POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): FINAL REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

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8.				(ii) LNSP, or the ENM in the case of <i>child connection points</i> . (iii) RoLR. CI 2(c)(i) reads: Management of in progress Service Orders associated with the NMIs the Failed Retailer was financially responsible for by the Failed Retailer The explanatory response (App A, Table 9-12, p26, Row 9) was more suitable drafting that the current drafting.	
9.				Note if a market child customer transfer CR is accelerated, the MC / MP / MDP will also have to undertake their service orders in an accelerated manner.	
10.				Embedded Networks The ENM is responsible for maintaining and updating MSATS and does not have a direct link to the network operation relating to a child within an embedded network. Service orders, which relate to physical activity (note – not MSATS CRs), will be undertaken by the EN Operator and or the retailer MC. It is unclear in the new framework what role the ENM will have in respect of EN operations.	
11.	United Energy			UE supports AGL's comments that the MC/MP and MDP should be included in parties that need to manage service orders. There could be an inflight service order request to undertake a supply upgrade and meter upgrade or to change meter configuration to gross or net metering etc. These inflight service orders, including the de-energisation or re-energisation of customers which may occur remotely and be acted on by the MDP need to be included. A new subclause for MC/MP and MDP should be added. This is consistent with the B2B Final rule where the existing B2B Procedures MUST be updated to cater for the metering competition and embedded network rules. UE also assumes that each registered MC will have a key ROLR contact on the ROCL and will be notified in accordance with 2 (a).	
12.	Endeavour	3	Reports	We submitted the below comments in the initial consultation. AEMOs' response is 'Noted. AEMO notes does not consider a change is necessary.' We do not see the value of having a diagram that is blurry and do not consider the effort to provide clearer diagrams would be great given the diagrams are exactly the same as the current version and the current version is clear. We have repeated our comments below and request that clearer diagrams be provided. Procedural improvement: Diagrams 2 and 3 are blurry and should be updated with a clearer diagram.	Agreed
13.	Origin			Figure 2 HIGH LEVEL ROLR PROCESS DIAGRAM Figure 3 HIGH LEVEL ROLR PROCESS TIMELINE Both diagrams are blurred and need to be clear in the final document	
14.	Ergon	4.2	General Obligations for MSATS Participants	Ergon Energy notes that MCs may have in-flight service orders that DNSPs are not aware of. As such we recommend that a further section is required to detail an MC's obligations in the event of a ROLR, for any in-flight service orders (e.g. for remote re-energisation / de-energisation).	The service orders in the ROLR procedure are considered only in Part B of the procedure. The IEC is the body responsible for approving changes to Part B. Therefore, AEMO does not have the power to make any changes to Part B outside of the IEC process and won't be making any comment on the suggested changes to Part B.
15.	United Energy	5.1	AEMO Obligations	<u>Embedded Networks</u> UE agrees with AusNet Services that the ENM should be listed. AEMO note that the LNSP is not listed, however the LNSP may be RP/MC and is involved in a ROLR event in relation to service orders, accuracy of billing and transfer reads/metering data. AEMO practice is to advise the LNSP and this is consistent with the regulatory framework. Both LNSP and ENM should be listed. An ENM (or ENO) may need to create transfer reads for off market children to accommodate a change of parent retailer.	Agreed
16.	United Energy	11.2	AEMO Obligations	UE support in principle the Ausgrid comment that if the failed retailer is also the MC then the ROLR retailer must either appoint an MC effective from the transfer date or be allocated into the MC role. UE presumes there needs to be a solvent company in the MC role at all times to ensure the metering installation and services are compliant. UE do not agree with the AEMO comment that the RP/MC no longer needs to be changed in a failed retailer scenario. It would be better to deal with these issues rather than have a further ROLR review and set of changes later this year when work focus is on Pack 2 and B2B. If AEMO were referring to the ROLR review in clause 19.1, this should not be used to amend the ROLR processes to deal with Metering Competition.	AEMO notes that the RP (MC) will no longer need to be changed in a Failed Retailer scenario. Feedback will be considered as part of a broader RoLR Process review, planned for later this year.

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17.	United Energy	18.1	Conditions Precedent	Amend 16.2 (f) to 16.1 (f)	Agreed.
18.	AGL	18.2	ROLR Event Affected MSATS Participants Obligations	Table 18 – last row Not appropriate for a FRMP to be reconciling the MDPs. FRMP should be responsible for reconciling the MCs MCs should be responsible for reconciling the MP/MDPs.	Agreed
19.	United Energy			18.2 (a) refers to table 18-A, correct reference is Table 18-1.	AEMO has reviewed and believes the reference to Table 18-A is correct.

Table 12 – Other Issues Related to Consultation Subject Matter

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

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1.	Active Stream	Drafting /change-mapping process	Tracked changes from the first round consultation had been accepted by AEMO in the second round consultation draft and therefore did not show up as a change to the original procedures. New sections have been added to procedures which were not consulted upon in the first round of consultation. The above two points have led to a protracted consultation review process with concerns that adequate time has not been given to address new sections included in the current consultation. Further, these sections and clauses are not included in the feedback template, which could mean that those changes may not be responded to as part of this consultation process. AGL consider this not good consultative practice – especially when there has not been clear communication to industry about the inclusion of these new sections and the reasoning behind the inclusions.	This consultation has been conducted in accordance with the rules consultation procedures under clause 8.9 of the NER. AEMO has followed a stage-based approach for showing all track changes made to draft procedures over the course of this consultation. That is, clean and marked-up copies of draft procedures are initially published at the start consultation. Track changes are then either accepted or rejected at the end of this first stage of consultation and detailed in the draft procedures that are released with the Draft Determination. A further series of track changes are made at the end of the second stage of consultation and detailed in the Final Determination. Following this stage-based approach enables AEMO to keep track of any amendments that have been made at each stage of the consultation.
2.	AGL		The draft procedures released for stage 2 are based on changes made to the draft procedures released for stage 1, rather than being based on the current authorised procedures being consulted on. This means that it is unclear exactly what changes are being made to procedures and has again made comparison and feedback on the procedure changes substantially difficult. AGL has significant concerns about this issue as it could cause flaws in the consultation process that result in consideration not being duly given to the changes between the current procedures to the proposed new procedures.	
3.	Energy Australia		The draft procedures released for stage 2 appear to be based on changes made to the draft procedures released for stage 1, rather than being the current authorised procedures being consulted on. This means that it is unclear exactly what changes are being made to procedures and has made comparison and feedback on the procedure changes substantially difficult. EA see this as concerning as it means that the consultation process may be flawed and that consideration is not being duly given to changes between the current procedures to the proposed new procedures. It's been difficult to cross reference procedures due to formatting and heading changes between.	
4.	Active Stream	Comments from first round of consultation	Referring to Appendix A – where AEMO agreed to industry participant comments or suggested changes, there are several instances where these have not been incorporated in to the second round consultation version.	Noted. AEMO responded to over 1,900 comments in Appendix A of the Draft Determination and has endeavoured to capture all of the changes that were approved during the first and second stages of consultation.
5.	Active Stream	Numbering /sequencing	There are several numbering and sequencing errors in the procedures and within the participant response template	AEMO has sought to improve the formatting and numbering of all procedures as part of this consultation. This includes the application of standard procedure template, styles and the use of section headings more section AEMO has resolved a number of formatting and numbering errors that were highlighted by participants in their first and second stage submissions.
6.	AGL	Formatting	The mixed and duplicated formatting used in these draft procedures has substantially complicated cross referencing and made the clauses difficult and clumsy to read. A defined multi-heading level formatting is more suitable for documents of this nature.	
7.	AGL	'End User'	There is an inconsistent use of 'end user'; The understanding of AEMO's intent was to standardise the term 'end user' but throughout the procedures this approach has not been consistent.	AEMO considers that the definition of 'end user' in the Glossary is appropriate and equally applicable across all procedures covered by the retail electricity market framework.
8.	Vector	Jurisdictional Matters	Like other participants, Vector AMS seek a harmonisation of jurisdictional requirements to enable the efficient operation of processes and procedures across each of the jurisdictions in the NEM. While Vector AMS acknowledge that AEMO does not have jurisdiction over such matters within the scope of this consultation, Vector AMS would like this opportunity to put on public record that we seek consistency across the NEM wherever possible and that we use the Power of Choice reforms as an opportunity to establish greater consistency and that AEMO and the Department of Industry and Regional Development (or equivalent) continue to work with industry and jurisdictional regulators towards this goal.	Noted.
9.	Pacific Hydro	Embedded Networks	At the PoC meeting on 7 July 2016, the need for a Procedure for managing Embedded Networks was discussed. Given the disparate processes and guidelines which currently exist across the NEM for the management of Embedded Networks, together with the changes brought about by PoC, the development of a single Procedure is required.	AEMO will be developing several documents related to Embedded Networks for Work Package 2. These include the ENM Service Level Procedure, Accreditation and Registration Procedures. Where possible, AEMO will look to consolidate these into a single procedure, as well as developing an Embedded Networks Guide as part of Work Package 2.
10.	Energy Australia		Our business has suggested that industry templates/responses be created that maintain key pieces of information that will assist with Embedded Networks connection processes (SMP processes will need to address this)	

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11.	Energy Australia	Program Plan and Forums	EA acknowledges that this is a very complicated set of changes and places and it places a lot of stain on all market participants. We are pleased with the consultative forum and the plan that was circulated regarding the overall program plan of PoC.	Noted.