

IMPACT & IMPLEMENTATION REPORT (IIR)

Summary Section

Issue number	IN001/21		
Impacted jurisdiction(s)	NSW/ACT.		
Proponent		Company	Jemena Gas Networks (JGN)
Affected gas market(s)	Retail	Consultation process (ordinary or expedited)	Ordinary
Industry consultative forum(s) used	GRCF	Date industry consultative forum(s) consultation concluded	Friday, 20 August 2021
Short description of change(s)	Amend the NSW/ACT Retail Market Procedure (RMP) so that certain Customer-owned reads (COR) can be treated as an actual read if the read satisfies certain conditions.		
Procedure(s) or documentation impacted	NSW/ACT RMPs.		
Summary of the change(s)	The changes proposed in this Impact and Implementation Report (IIR) involve amending the NSW/ACT RMP so that certain Customer-owned reads (COR) can be treated as an actual read. These amendments will align the RMPs with the temporary process that has been operating in Jemena Gas Networks (JGN) network sections since mid-2020 that were implemented to reduce the number of estimated reads as a result of limitations placed on JGN meter readers ability to read meters in a timely and safe fashion due to COVID-19 social distancing restrictions.		
IIR prepared by	Danny McGowan	Approved by	Michelle Norris
Date IIR published	10 September 2021	Date consultation concludes	11 October 2021
Email address for responses	grcf@aemo.com.au		
Other key contact information			



IMPACT & IMPLEMENTATION REPORT

1. DESCRIPTION OF ISSUE

1.1. Background

In April 2020 Jemena Gas Networks (JGN) advised AEMO that, with the social distancing restrictions in place for COVID-19, JGN expected to see a large increase in the volume of estimated meter reads due to meter readers not being able to access apartment blocks and other medium-density/high-rise premises to read meters. To minimise the estimated read impact on customers, JGN proposed to temporarily send customer-own reads (COR) as actual meter reads. JGN also advised AEMO that they would seek the views of the Australian Energy Regulator (AER) on this proposal.

In August 2020 JGN advised AEMO that they had received advice from the AER that the AER proposed not to take any action in relation to JGN's non-compliance with certain sub-clauses within clause 3.5 of the NSW/ACT Retail Market Procedures (RMP) in respect to the temporary measure of treating eligible¹ COR as actual meter reads. The no-action letter covered the period up to 31 December 2020². These temporary measures to treat some COR as actual meter readings have therefore been implemented in JGN's systems.

1.2. Summary of the issue

As noted above, in order to mitigate the impact of estimated reads, JGN with a preapproved regulatory reprieve from the AER, implemented a temporary process whereby some COR would be treated as an actual read, resulting in fewer estimated reads.

This temporary process to allow COR to be treated as an actual read required that:

- (i) the customer supplies a photograph of the meter;
- (ii) the photograph sent to JGN is close to the scheduled read date; and
- (iii) the meter reading passes JGN's validation checks.

Jemena has advised that this temporary process has proven to be a very efficient and effective means to reduce the number of estimated reads. Therefore, JGN is proposing to continue with this process and has put forward a proposal to amend the RMP to include provisions that describe the criteria that JGN will apply when determining whether a COR can be treated as an actual read. See section 3 for further details on the RMP changes.

1.3. Submission instruction to this second stage consultation

Anyone wishing to make a submission for this second stage consultation stage is requested to use the response template provided in Attachment A. Submissions close 11 October 2021 and should be e-mailed to grcf@aemo.com.au.

¹ JGN advice to the AER proposed to mitigate the impact of estimated reads on customers, by substituting customer-own reads as actual reads under three conditions: (i) the customer supplies a photograph of the meter; (ii) the photograph is uploaded close to the scheduled read date; and (iii) the read passes Jemena's validation checks.

² This "no action" has been extended to 30 November 2021.



2. REFERENCE DOCUMENTATION

Retail Market Procedures (NSW and ACT) version 26.

3. OVERVIEW OF CHANGES

In summary the main amendments to the NSW/ACT RMPs are:

- (i) Add three new definitions to clause 1.2.1 (“Definitions”), namely “Customer-own read (Actual)”, “Customer-own read (Actual) criteria”, and “Customer-own read (Actual) methodology”;
- (ii) Modify five existing definitions in clause 1.2.1 (“Definitions”), in particular “estimated meter reading” and “validated meter reading”;
- (iii) Add a new sub-clause to clause 2.2(b)(viii) — namely, sub-clause 2.2(b)(viii)(E) — that requires the Network Operator to store the information used to validate a Customer-own read (Actual) meter reading and the information used to verify that meter reading meets the Customer-own read (Actual) criteria;
- (iv) Add a new sub-clause to clause 3.1.1 — namely, sub-clause 3.1.1(f) — that allows the Network Operator to not read a meter if the customer has entered into an arrangement with the Network Operator to provide COR (Actual);
- (v) Add new sub-clause to clause 3.1.1 — namely, sub-clause 3.1.1(g) — that requires that AEMO publish a Customer-own read (Actual) methodology which specifies the criteria for a COR to be actual read and the requirements for a Network Operator to arrange to receive a Customer-own read;
- (vi) Add notes to clause 3.5 that explains what type of read would be provided in the Meter Data Notification (MDN) transaction;
- (vii) Add two new sub-clauses to clause 3.5.1 — namely, sub-clauses 3.5.1(j) and 3.5.1(k) — that detail the requirements of what information the Network Operator must provide to the Financially Responsible Organisation (FRO) in the case of a Customer-own read (Actual); and
- (viii) Add two new sub-clauses to clause 3.5.4 that places an obligation on the Network Operator to provide a report³ on Customer-own read (Actual).

This proposal also includes a new separate procedure called the “Customer-own read (Actual) methodology” which specifies the arrangements to receive the customer read, validation requirements and a section the specifies information to be provided in a report.

See attachment B and C for further details.

4. LIKELY IMPLEMENTATION EFFECTS AND REQUIREMENTS

The likely implementation effect is negligible on the basis that the JGN has been operating the IT systems and process effectively and efficiently for some months without any material issues being

³ It should be noted that a report on COR (A) is currently being provided under the temporary process that has been operating in JGN network sections since mid-2020.



raised. As testimony to this position, the AER has provided two extensions in relation to JGN's non-compliance with certain clause within RMPs.

5. OVERALL COST AND BENEFITS

In terms of costs, JGN has already implemented their system and business process to treat some customer own reads as actuals. As such, there are not expected to be any further system costs to JGN. The GMI that was sent to AEMO proposing RMP stated the changes were only documentation changes. No costings were provided, therefore AEMO has considered the Network Operator cost to be zero.

The changes do not impact the AEMO IT system. The only cost for AEMO is to facilitate the consultation, therefore AEMO's costs are negligible.

During the pre-consultation process, Retailers have not raised any material cost concerns with AEMO. In terms of the overall costs, based on the information that it has obtained, AEMO's view is the overall industry cost to implement this change is negligible.

In relation to benefits, as noted in the GMI, the proposed change will result in more accurate billing for any customer who chooses to submit a customer-own read. In turn this will reduce the costs incurred by Retailers and Network Operators in resolving estimated bill customer concerns. During the pre-consultation phase no Retailer opposed these benefits.

Noting the above, AEMO put forward a view in the first round of consultation that the benefits associated with this change would outweigh the costs and invited participants make a submission if they believed AEMO's overall position was unreasonable. No participants opposed the AEMO position on this issue therefore AEMO maintains its position that benefits will outweigh the costs.

6. MAGNITUDE OF THE CHANGES

AEMO considers the order of magnitude of this change is 'non-material'.

7. AEMO'S ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH SECTION 135EB:

As part of the first-round consultation (PPC), AEMO put forward the following assessment regarding compliance with section 135EB of the National Gas Rules:



<p>Consistency with National Gas Law (NGL) and NGR</p>	<p>Under the auspices of AEMO’s statutory functions relating to the NGL and NGR, it is AEMO’s view that the proposed change is consistent with the NGL and NGR because the proposed change promotes efficiency of the operation of the gas market via more accurate bills and improves price and quality outcomes for consumers by minimising the frustration from estimated bills. In reaching this decision AEMO also factored in the advice it has received⁴ from Retailers that they agree with JGN position that no changes were needed to either the NERR⁵ or NGR</p>
<p>National Gas Objective</p>	<p>As outlined in Section 5, it is AEMO's view that this change will reduce the costs incurred by Retailers and Network Operators in resolving estimated bill customer concerns and will improve overall customer satisfaction experience.</p>
<p>Any applicable access arrangements</p>	<p>AEMO’s view is that the proposed change is not in conflict with existing Access Arrangements.</p> <p>No participant raised any objections during the pre-consultation regarding the proposal’s consistency with any existing Access Arrangements.</p>

No participant submitted any opposing views in relation to AEMO’s assessment during the first-round consultation. AEMO therefore maintains its original assessment as described above.

8. CONSULTATION OUTCOMES

On 6 August 2021 AEMO published on its website a PPC that put forward changes to the NSW/ACT RMPs in Attachment B and C. Registered participants and interested stakeholders were invited to make submissions which closed on 20 August 2021.

Submissions were received from Energy Australia, Jemena Gas Networks, Origin Energy, Red/Lumo, and AGL. The submissions received from Energy Australia and Jemena Gas Networks provided unconditional support of the proposed changes. The other submissions did not oppose AEMO initial assessments of the proposal.

⁴ See minute from June 2021 Gas Retail Consultative Forum (GRCF) meeting. Click [here](#) to view.

⁵ In relation to the NERR, AEMO has previously provided advice to participants that it is not within AEMO’s remit to provide advice on regulator instruments when the processes do not directly involve AEMO, and that Retailers will need to undertake their own assessment of any NERR impacts.



Some submissions included a request for additional system functionality in the form of a report be considered which AEMO has agreed to include the report because the report is being provided as part of the temporary process that JGN implemented in mid-2020. Some submissions contained additional suggestions to further improve the redrafting of specific clauses. There was also feedback on issues that were broader than AEMO's remit. See Attachment D for further information on the feedback received and AEMO's response to any specific issues or suggestions that were raised.

IMPACT & IMPLEMENTATION REPORT – RECOMMENDATION(S)

9. SHOULD THE PROPOSED PROCEDURES BE MADE?

AEMO recommends making the changes proposed in Attachment B and C.

10. PROPOSED TIMELINES

Subject to all necessary approval's AEMO is targeting to implement this change in late November 2021.

In order to achieve this timeline, AEMO proposes the following key milestones:

- Issue Impact and Implementation Report (IIR) on Friday 10 September 2021
- Submission on IIR close Monday 11 October 2021
- Issue AEMO decision Friday 1 November 2021
- Effective date 29 November 2021



ATTACHMENT A – IIR RESPONSE TEMPLATE

A response template has been attached separately to this document. Anyone wishing to make a submission to this first stage consultation are to use this response template. Submissions close Monday 11 October 2021 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B - DOCUMENTATION CHANGES - RMP

Draft versions of the RMPs (extract) showing tracked changes between the current version and the proposed changes are shown below. Blue underline means addition and ~~red-strikeout~~ means delete. **Yellow shade** shows the changes made post the PPC version.

Clause 1.2.1 Definitions

<i>actual meter reading</i>	The figures or other information shown on a meter or instrument as <u>actually read</u> . <u>For the purpose of these Procedures, a Customer-owned read (Actual) is taken to be an actual meter reading.</u>
<i>Customer-owned read</i>	A read of a meter undertaken by a Customer, details of which are provided by the Customer to the User or Network Operator for the delivery point to which the meter relates. <u>For the purpose of these Procedures, except for a Customer-owned read (Actual),</u> but <u>A Customer-owned read is taken to be an estimated meter reading.</u>
<u>Customer-owned read (Actual)</u>	<u>A Customer-owned read that satisfies the Customer-owned read (Actual) criteria. For the purpose of these Procedures, a Customer-owned read (Actual) is taken to be an actual meter reading.</u>
<u>Customer-owned read (Actual) criteria</u>	<u>Those requirements for Customer-owned reads (Actual) contained in the Customer-owned read (Actual) methodology.</u>
<u>Customer-owned read (Actual) methodology</u>	<u>An industry approved methodology that specifies the requirements for a Customer-owned read (Actual) which must be used for the purposes of these Procedures.</u>
<i>estimated meter reading</i>	An estimate of an <u>actual meter reading (including an actual meter reading that is a Customer-owned read (Actual))</u> that is made under these Procedures in accordance with an <u>approved estimation methodology, or a Customer-owned read (but in the case of a read which is a Customer-owned read (Actual), only in the case where that read fails validation)</u> .
<i>special read</i>	A read undertaken <u>by the Network Operator</u> other than on a <u>scheduled read date</u> .
<i>validated meter reading</i>	A meter reading that has been validated in accordance with an <u>approved validation methodology or for a Customer-owned read (Actual), that has been validated in accordance with the Customer-owned read (Actual) methodology.</u>



Clause 2.2 Network Operator Metering Database

(a) Each *Network Operator* must create, maintain and administer a *metering database* that includes the following information in respect of each *delivery point* in its *network*:

- (i) the MIRN;
- (ii) the *delivery point's* *discovery address* and any other site address information specified in the *Gas Interface Protocol*;
- (iii) the *delivery point's* *customer characterisation*;
- (iv) the *delivery point's* *meter reading frequency*;
- (v) the *distribution tariff* to which that *delivery point* is assigned;
- (vi) the supply point(s) associated with the *delivery point*;
- (vii) for each *meter* at a *delivery point* or associated supply point:
 - (A) the *meter number* of the current installed meter;
 - (B) the *meter number* of the previous installed *meter(s)*, and the date and reason for each *meter change*;
 - (C) the next *scheduled read date* on which the *meter* is to be read;
 - (D) the *network section* in which it is located;

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- (E) the next known date (if any) on which a *special read* of the *meter* is to occur;
 - (F) the type of communication equipment (if any); and
 - (G) whether the *meter* is *de-energised* or *disconnected*.

(viii) for each *meter reading* undertaken during the previous 7 years:

- (A) the date the *meter reading* was undertaken;
- (B) the type of *meter reading* (validated actual by the Network Operator, validated *Customer-own read*, validated Customer-own read (Actual), estimated, or substituted);
- (C) the *meter reading*; **and**
- (D) if the *meter reading* is an *estimated meter reading* or *substituted meter reading*:
 - (a) the date to which that *estimated meter reading* or *substituted meter reading* relates;
 - (b) the reason for the *estimated meter reading* or *substitution meter reading*; and
 - (c) the type of the *approved estimation methodology* or *approved substitution methodology* applied to obtain that *meter reading*; and
- (E) if the *meter reading* is a *Customer-own read (Actual)*, the information used to verify that the *meter reading* meets the *Customer-own read (Actual) criteria*.



Clause 3.1 Meter reading

3.1.1 Next Scheduled Read Date

- (a) Each Network Operator must provide to the Retailer who is the FRO for a delivery point in its network, the next scheduled read date for a meter relating to that delivery point.
- (b) A Retailer may request the relevant Network Operator to change the date of the next scheduled read date for a meter relating to a delivery point for which the Retailer is the FRO. However, the Network Operator is not required to make the requested change.
- (c) A Network Operator must notify each Retailer who is the FRO for delivery points in its network of a change to the previously notified next scheduled read dates for a number of delivery points that represent a set, or multiple sets, of established meter reading schedules, as far as practicable prior to that change being made.
- (d) Subject to clause 3.1.1 (f) Aa Network Operator must use its reasonable endeavours to read a meter at a delivery point in accordance with the scheduled read date or as otherwise agreed with the Retailer who is the FRO for the delivery point.
- (e) If a Network Operator is unable to read the meters comprising a discrete route in accordance with the scheduled read date, the Network Operator must use its reasonable endeavours to notify that failure to each Retailer who is a FRO for a delivery point to which such a meter relates by 5.00 pm on the 2nd business day after the day on which it was unable to read the meter.
- (f) A Network Operator is not required to read a meter at a delivery point in accordance with clause 3.1.1(d) if the Network Operator has received, or arranged has as arrangement to receive in accordance with the Customer-own read (Actual) methodology, a Customer-own read (Actual) for that meter in accordance with that scheduled read date or as otherwise agreed with the Retailer who is the FRO for that delivery point
- (g) AEMO must ensure that at all times there is a Customer-own read (Actual) methodology which specifies:
 - (i) the criteria that must be satisfied to be met for a Customer-own read to be a Customer-own read (Actual) and
 - (e)(ii) the requirements for a Network Operator's to arrange to receive a arrangements for receiving a Customer-own read (Actual) from a Customer for the purpose of clause 3.1.1(f)



Clause 3.5 Provision of Meter Reading Information

3.5.1 General Meter Readings

- (a) Subject to clause 3.1.7(c) and clause 4.1, a *Network Operator* must comply with the applicable requirements of this clause 3.5.1 for the provision of information to the *FRO* for a *delivery point* in the *Network Operator's network* in respect of each *meter* for the *delivery point* (identified by reference to its *MIRN*).
- (b) Where the *Network Operator* has read the *meter* in accordance with a *scheduled read date* and the *actual meter reading* is a *validated meter reading*, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:
 - (i) the day on which the *meter* was read
 - (ii) the next *scheduled read date*; and
 - (iii) the *validated meter reading* for that meter,

by 5.00 pm on the next *business day* after the day on which a *gas meter* was read, or by 5.00 pm on the 4th *business day* after the day on which a *hot water meter* was read;

Note: For the purpose of the *Gas Interface Protocol, Participant Build Pack 5*, the *meter reading* under (b) will be assigned the value of "A" for the purpose of the field "Type of Read" in the *Meter Data Notification (MDN) transactions*.

- (c) Where the *Network Operator* has read the *meter* in accordance with a *scheduled read date* but the *actual meter reading* is not a *validated meter reading*, the *Network Operator* must:
 - (i) undertake an *estimated meter reading* as at that date in accordance with clause 3.3; and
 - (ii) use its reasonable endeavours to provide the *FRO* with the following information:
 - (A) the next *scheduled read date*;
 - (B) the *estimated meter reading* (identified as such) for that *meter*;
 - (C) the details of the *approved estimation methodology* applied to obtain that *estimated meter reading*; and
 - (D) the reason for the *actual meter reading* not being a *validated meter reading*,

by 5.00 pm on the 2nd *business day* after the day on which a *gas meter* was read or by 5.00 pm on the 5th *business day* after the day on which a *hot water meter* was read.

Note: For the purpose of the *Gas Interface Protocol, Participant Build Pack 5*, the *meter reading* under (c) will be assigned the value of "E" for the purpose of the field "Type of Read" in the *Meter Data Notification (MDN) transactions*.



(d) Where the *Network Operator* has been unable to read the meter on a scheduled read date, the *Network Operator* must:

- (i) undertake an *estimated meter reading* as at the *scheduled read date* in accordance with clause 3.3; and
- (ii) use its reasonable endeavours to provide the *FRO* with the following information:
 - (A) the next *scheduled read date*;
 - (B) the *estimated meter reading* (identified as such) for that *meter*;
 - (C) the details of the *approved estimation methodology* applied to obtain that *estimated meter reading*; and
 - (D) the reason for the *Network Operator* not being able to read the meter,

by 5.00 pm on the 2nd *business day* after the *scheduled read date* for a *gas meter* or by 5.00 pm on the 5th *business day* after the *scheduled read date* for a *hot water meter*.

Note: For the purpose of the *Gas Interface Protocol, Participant Build Pack 5*, the meter reading under (d) will be assigned the value of "E" for the purpose of the field "Type of Read" in the Meter Data Notification (MDN) transactions

(e) Where the *Network Operator* has been unable to obtain a *validated meter reading* on a *scheduled read date*, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:

- (i) the day on which the meter was *read*;
- (ii) the next *scheduled read date*; and
- (iii) the *validated meter reading* for that meter,

by 5.00 pm on the 2nd *business day* after the day on which a *gas meter* was read or by 5.00 pm on the 5th *business day* on which a *hot water meter* was read.

(f) **Unless the *Network Operator* has been provided with a *Customer-own read (Actual)*** ~~Where~~ the *Network Operator* has been provided a *Customer-own read* by the *FRO* or the *Customer*, and the *Network Operator* reasonably considers the *Customer-own read* to be accurate, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:

- (i) the day on which the meter was *read*;
- (ii) the next *scheduled read date*;
- (iii) the *validated meter reading* for that meter; and
- (iv) a flag indicating that the *reading* was a *Customer-own read*,

by 5.00 pm on the next *business day* after the day on which the *Customer-own read* for a *gas meter* was validated by the *Network Operator* or by 5.00 pm on the 5th *business day* after the day on which the *Customer-own read* for a *hot water meter* was received by the *Network Operator*.

Note: For the purpose of the *Gas Interface Protocol, Participant Build Pack 5*, the meter reading under (f) will be assigned the value of "C" for the purpose of the field "Type of Read" in the Meter Data Notification (MDN) transactions



- (g) Where the *Network Operator* has undertaken a *special read* of the *meter* that was requested by the *FRO* for the *delivery point* to which that *meter* relates, and the *actual meter reading* is a *validated meter reading*, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:
- (i) the day on which the *meter* was read;
 - (ii) the next *scheduled read date*; and
 - (iii) the *validated meter reading* for that *meter*,

by 5.00 pm on the next *business day* after the day on which a *gas meter* was read or by 5.00 pm on the 4th *business day* after the day on which a *hot water meter* was read.

Note: For the purpose of the *Gas Interface Protocol*, Participant Build Pack 5, the *meter reading* under (g) will be assigned the value of "A" for the purpose of the field "Type of Read" in the *Meter Data Notification (MDN) transactions*

- (h) Where:
- (i) the *Network Operator* has undertaken a *special read* of the *meter*, but the *actual meter reading* is not a *validated meter reading*; or
 - (ii) the *Network Operator* has been unable to read the *meter* on a *special read date*,

the *Network Operator* must use its reasonable endeavours to notify the *User* who requested the *special read* of that fact (and the reason for it), and to specify the next day on which a *special read* of that *meter* can be undertaken by the *Network Operator*, by 5.00 pm on the next *business day* after the *special read date**.

- (i) Where the *Network Operator* has substituted a *meter reading* in accordance with an *approved substitution methodology*, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:
- (i) the date to which the *substituted meter reading* pertains;
 - (ii) the *substituted meter reading* (identified as such) for that meter;
 - (iii) the next *scheduled read date*; and
 - (iv) details of the *approved substitution methodology* applied to obtain that *substituted meter reading*,

by 5.00 pm on the next *business day* after the day on which the *substituted meter reading* was calculated.

Note: For the purpose of the *Gas Interface Protocol*, Participant Build Pack 5, the *meter reading* under (i) will be assigned the value of "S" for the purpose of the field "Type of Read" in the *Meter Data Notification (MDN) transactions*



(j) Where the Network Operator has been provided with a Customer-own read (Actual) by the Customer that is a validated meter reading, the Network Operator must use its reasonable endeavours to provide the FRO with the following information:

(i) the day on which the meter was read;

(ii) the next schedule read date;

For the avoidance of doubt, nothing in this clause requires the Network Operator to attempt to read the meter on a specified day unless the relevant retailer nominates that day for that purpose in a special read request, in which case clause 3.3.3 will apply.

(iii) the validated meter reading for that meter; and

(iv) a flag indicating that the reading was a Customer-own read (Actual)

by 5.00 pm on the next business day after the day on which the Customer-own read (Actual) for a gas meter was validated by the Network Operator or by 5.00 pm on the 5th business day after the day on which the Customer-own read (Actual) for a hot water meter was received by the Network Operator.

Note: For the purpose of the Gas Interface Protocol, Participant Build Pack 5, the meter reading under (i) will be assigned the value of "A" for the purpose of the field "Type of Read" in the Meter Data Notification (MDN) transactions

(k) Where the Network Operator has been provided with a Customer-own read (Actual) by the Customer that is not a validated meter reading, the Network Operator must:

(i) Undertake an estimated meter reading as at the date in accordance with clause 3.3; and

(ii) use its reasonable endeavours to provide the FRO with the following information:

(A) the next scheduled read date;

(B) the estimated meter reading (identified as such) for the meter;

(C) the details of the approved estimation methodology applied to obtain that estimated meter reading; and

(D) the reason for the Customer-own read (Actual) not being a validated meter reading.

by 5.00 pm on the 2nd business day after the day on which the Customer-own read (Actual) was provided or by 5.00 pm on the 5th business day after the day on which a Customer-own read (Actual) for a hot water meter was received by the Network Operator.

Note: For the purpose of the Gas Interface Protocol, Participant Build Pack 5, the meter reading under (k) will be assigned the value of "E" for the purpose of the field "Type of Read" in the Meter Data Notification (MDN) transactions



Clause 3.5.4

(e) Without limiting any other provision in clause 3.5.4, a Network Operator must use reasonable endeavours to prepare a report for each FRO for delivery points in its network with a Customer-own read (Actual) (Customer-own read (Actual) Report) which must

(i) contain information from its metering database as specified in the Customer-own read (Actual) methodology;

(ii) only contain information for delivery points for the period during which the FRO was registered as the FRO for the delivery points in the AEMO metering database; and

(iii) be provided to the FRO for the delivery point.

(f) In relation to the Customer-own read (Actual) Report prepared in accordance with paragraph (e), the Network Operator may determine:

(i) the period of time captured in the report;

(ii) the format and method of delivery; and

(iii) the frequency it is provided to the FRO.

~~(iii)~~ but must consult with Participants in relation to these matters



ATTACHMENT C - DOCUMENTATION CHANGES – COR (ACTUAL) RMP

Draft versions of the Customer Own Read (Actual) Methodology has been attached separately to this document. This is a new methodology for NSW/ACT.

Yellow shade shows the changes made post the PPC version.

ATTACHMENT D – FEEDBACK GIVEN TO PPC

Section 1 - General Comments on the Proposed Procedure Change

Topic	Ref #	Participant	Response	AEMO Response
Sections 1 to 9 of the PPC sets out details of the proposal.	1	Energy Australia	Yes, Energy Australia does support this proposal	AEMO notes Energy Australia’s support for this proposal.
Does your organisation support AEMO’s assessment of the proposal? If no, please specify areas in which your organisation disputes AEMO’s assessment (include PPC section reference number) of the proposal and include information that supports your organisation’s rationale for not supporting AEMO’s assessment.	2	JGN	JGN provided a letter indicating JGN support for the current drafting of the Retailer Market Procedure changes. This change provides opportunities for more customer retail bills to be based on actual consumption data and that the proposed changes will directly benefit JGN customers who have meters located inside their dwellings where obtaining access for regular meter reading is difficult. As a result, many are frequently billed on automated estimates of their consumption	AEMO notes JGN’s support for this proposal.
	3	OE	Origin have submitted comments related to the proposed changes to Retail Market Procedures as per below.	In terms of the matter put forward in the Proposed Procedure Changes (PPC) paper itself, AEMO has noted that Origin Energy hasn’t opposed any aspect of the PPC. In relation to the comments on the RMPs and COR (A) methodology,

				AEMO has provided a response to each comment.
4	Lumo/Red	Red Energy and Lumo Energy (Red and Lumo) provide conditional support for AEMO’s assessment on the requirement that Customer-own read (Actual) Methodology is amended to consider <u>only</u> the approved validation methodology currently referred to in Attachment 1 of the NSWACT RMP. Consequently, we have some recommendations to improve the Customer-own read (Actual) Methodology and the proposed changes to the RMP.	In terms of AEMO’s assessment of the proposal, AEMO has noted that Red Energy and Lumo Energy conditional support. In relation to the condition support comment, please see AEMO response in ref# 11 whereby AEMO has amended section 7(b) in the Customer-own read (Actual) Methodology to clarify that 7(b) is not an option for a read to be validated outside of the approved validation methodology, via non-prescribed mechanisms or an alternate methodology.	
5	AGL	AGL considers that while this proposal has had a lot of excellent work done on it, the finer details can still be further developed, and expects that the PPC process will bring those to light.	AEMO notes AGL supports for JGN’s proposals to gain better quality meter data. In terms of the matters put forward in the Proposed Procedure Changes (PPC) paper itself, AEMO has noted that AGL hasn’t opposed any aspect of the PPC.	

				<p>In relation to the comments on details to be further developed, AEMO has provided a response to each comment, in particular see AEMO response in ref# 22, 23, 34, 35 and 37.</p>
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Section 2 – Comments on the changes described in Section 3 of the Proposed Procedure Change

Ref #	Participant	RMP Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
NSW/ACT RMPS					
6	JGN	1.2.2 Definitions	Customer-own read (Actual)	Insert the word “the” after the word “satisfied”	AEMO agrees and has added the missing word “the”.
7	OE	1.2.2 Definitions	Estimated meter Reading Definition. Should this conclude with “only in the case where the read fails Customer-own read (Actual) criteria or validation? As this incorporates both the validation of the read in addition to the exclusive criteria’s as set out in the methodology document. If it fails one Or the other, then the read cannot be classified as Actual.	An estimate of an actual meter reading <u>(including an actual meter reading that is a Customer-own read (Actual))</u> that is made under these Procedures in accordance with an approved estimation methodology, or a Customer-own read <u>(but in the case of a read which is a Customer-own read (Actual), only in the case where it that read fails the criteria or validation.</u>	AEMO does not support adding the words “the criteria or” to this definition as, by definition, a ‘Customer-own read’ that does not meet the criteria will not be a Customer-own read (Actual) or an actual meter reading.
8	Red/ Lumo	1.2.1	Definitions estimated meter reading Red and Lumo suggest that this definition could be simplified to describe these equivalent points: An estimate of an actual meter reading that is made under these Procedures in accordance with an approved estimation methodology, or a Customer-own read, or a Customer-own read (Actual) which fails validation	An estimate of an actual meter reading (including an actual meter reading that is a Customer-own read (Actual)) that is made under these Procedures in accordance with an approved estimation methodology, or a Customer-own read, (but in the case of a read which is a Customer-own read (Actual), only in the case where that read fails validation). or a Customer-own read (Actual) which fails validation.	AEMO does not support Red/Lumo proposal to delete this text namely as AEMO’s considers that the words proposed in brackets are needed after the term ‘actual meter reading’, as a Customer-own read (Actual) is considered an actual meter reading.



9	AGL	1.2.1	<p>Estimated Meter Reading</p> <p>This definition is somewhat convoluted and can be simplified. See proposed text. Note use of criteria vs validation. See below for further information</p>	<p>An estimate of an <i>actual meter reading</i> that is made under these Procedures in accordance with an <i>approved estimation methodology</i>, or a <i>Customer-own read</i>, which includes a Customer-Own Read(Actual) which fails the CoR(A) criteria.</p> <p>but in the case of a read which is a Customer-own read (Actual), only in the case where that read fails validation).</p>	See AEMOs response in ref#8.
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10	AGL	1.2.1	<p>Estimated Meter Reading</p> <p>The validation requirements for a CoR(A) [Industry Methodology - CI 7] are different to the criteria applied to separate a CoR(A) from a CoR [Industry Methodology CI 6].</p> <p>CI 6 - Criteria specifies that the reading must be submitted within a timeframe (-4 to +2) as part of the acceptance criteria.</p> <p>CI 7 – Validation speaks to the validity of the data and the reading.</p> <p>AGL understands that the intent was that a CoR may meet all the requirements for validation (CI 7), but if it is not provided within the read-window (CI 6), it remains a CoR and cannot be a CoR(A).</p> <p>For a customer provided reading to be a CoR(A) it must be:</p> <ul style="list-style-type: none"> • be submitted electronically (CI 6 (a)) • submitted within the read-windows (CI 6(b)); and • meet the validation criteria (CI 7). <p>However, if a CoR is submitted outside the read-window and also fails validation, AGL understands that it will be left as a CoR, which may be used in future meter data processes (eg estimation).</p> <p>As such, AGL suggests that the definition for an estimated reading (ie a CoR) be that a CoR(A) fails the submission criteria (CI 6) but passes the validation criteria (CI 7), and therefore the definition be amended as shown.</p> <p>If the submission fails the validation tests, then the submitted data should be ignored and a</p>	<p>An estimate of an <i>actual meter reading</i> that is made under these Procedures in accordance with an <i>approved estimation methodology</i>, or a <i>Customer-own read</i>, which includes a Customer-Own Read (Actual) which fails the CoR(A) criteria.</p>	<p>See AEMOs response in ref#8.</p>
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IMPACT & IMPLEMENTATION REPORT (IIR)
ISSUE No: [TEXT]



			network estimate provided. See flow chart at the end of the response.		
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11	Red/ Lumo	1.2.1	<p>Validated meter reading</p> <p>Red and Lumo strongly oppose the definition contained within the PPC because it refers unnecessarily to Customer-own read (Actual) Methodology.</p> <p>A Customer-own read (Actual) which meets the criteria of the Customer-own read (Actual) Methodology is considered an actual meter reading and should then proceed through validation methodology to be published as an actual meter reading.</p> <p>We do not support the additional proposed text which provides an option for validation outside the 'approved validation methodology' currently detailed in Attachment 1 of the NSWACT RMP.</p>	<p>A meter reading that has been validated in accordance with an approved validation methodology or for a Customer-own read (Actual) that has been validated in accordance with the Customer-own read (Actual) methodology.</p>	<p>AEMO does not support the proposal to remove the text for the Customer Own Read (Actual) to be validated against the Customer-own read (Actual) methodology (Section 7 (Validation) from this RMP definition. However, AEMO has amended section 7(b) in the Customer-own read (Actual) Methodology to clarify that 7(b) is not an option for a read to be validated outside of the approved validation methodology, via non-prescribed mechanisms or an alternate methodology. (See Ref# 32 and,33)</p> <p>The validation of a Customer-own read (Actual) in the Customer-own read (Actual) methodology applies the <i>approved validation methodology</i> in Attachment 1 of the RMP. This is section 7 (a) within the Customer-own read (Actual) methodology.</p> <p>Section 7(b) was intended to explain that the Network Operator can use the information provided for the Customer-own read (Actual) for validation, however AEMO understands that the previous drafting in 7(b) may have indicated that a different validation methodology could be used by the Network Operation. Therefore, AEMO has amended section 7(b) to clarify that photograph can be used for validation. The information used to validate the customer own read will be recorded by the distributor.</p>
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					<p>Therefore, the only difference for validation for a Customer-own read (Actual) is that the Network Operator representative can review the photograph submitted (which is not done with reads from Network Operator meter readers). This review can rule out typographical errors (e.g. when a 5 is entered in as an 8) or errors where the wrong meter was read (by checking the meter serial number).</p>
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12	AGL	2.2 (vii)(b) Network Operator	<p>Clause (vii)(b) specifies the types of meter reading the Network Operator data base must record. Under the gas schema, these meter-read types have definitions specified in the gas buildpack 1:</p> <p>Type of Read Indicator identifying the type of reading which has taken place. A = Actual, E = Estimated S = Substituted C = Customer Own Read.</p> <p>There is no schema element for CoR(A), and as CoR(A) reads are classed as Actual (Read Type = A), AGL believe that the addition to clause (vii)(b) should be deleted.</p> <p>See also note in clause 3.5.1(j) regarding allocating CoR(A) as Read Type = A.</p> <p>In saying this, AGL also notes that there is no obligation to maintain records of the photograph and meter reading to support the verification of a CoR as a CoR(A).</p>		<p>AEMO has assumed that AGL clause reference in the section of the feedback is incorrect (2.2 (vii) (b)) and that the clause reference AGL is referring to is in fact clause 2.2 (a) (viii) (B).</p> <p>AEMO has deleted the words “validated Customer-own read (Actual)” from the provision that requires the Network Operator to include in its database information about type of meter reading include a validated Customer-own read (Actual)”, as Customer-own read (Actual) will be identified as “A” when validated, and “E” when not validated. This type of read is also included in the report described 3.5.4 (e) See also AEMO response ref #14</p> <p>AEMO does not support AGL comment about there is no obligation to record information (eg: photograph) about validated Customer-own read (Actual)”. Clause 2.2 (a) (viii) (E) requires the Network Operator to record the information used to verify that meter reading meets the Customer-own read (Actual) criteria. It is also worth noting that under section 8 (i) of the COR (A) methodology, the Network Operator provides a photolink to the jpeg photograph provided by the Customer.</p>
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13	JGN	Cl. 2.2(a)(viii): Cl 2.2.(a) (viii) (E)	there appears to be a ‘,’ missing there appears to be a missing “the”		In relation to the missing “coma” given the change in ref #12, this is no longer relevant. AEMO agrees and has added the missing word “the”.
14	Red/ Lumo	2.2 Network Operator Metering Database (viii) (B)	Red and Lumo suggest that for the purposes of the Network Operator metering database the term ‘validated’ is not required. A read provided by the customer as a Customer-own read (Actual) may either be; 1. a validated Customer-own read (Actual) . Customer-own read (Actual) 2. validated Customer-own readCustomer-own read (Actual) which did not meet the criteria of the Customer-own read (Actual) Methodology 3. or an estimated read . Customer-own read (Actual) which failed validation. (As a Customer-own read (Actual) which did not meet the criteria of the Methodology ceases to be a Customer-own read (Actual) and becomes a Customer-own read.	(viii) for each meter reading undertaken during the previous 7 years: (A) the date the meter reading was undertaken; (B) the type of meter reading (validated actual by Network Operator, validated Customer-own read, validated Customer-own read (Actual), estimated, or substituted);	See ref #12
15	JGN	Cl. 3.1.1(e):	‘a’ or ‘the’ needs to be deleted		AEMO agrees and has delete “a”.
15a	AEMO	Cl. 3.1.1(f):	AEMO proposes a minor to the wording arranged. The words “has an arrangement” is more consistent with the wording in the Customer-own read (Actual) methodology, which refers to a ‘an arrangement with a Customer to receive a Customer-own read (Actual)		AEMO has made this change.



16	Red/ Lumo	3.1.1 (d) and (f)	<p>We do not support the use of the words 'reasonable endeavours' in relation to a network having to read a meter, as it is the clear responsibility for a network operator to read a meter. Red and Lumo also do not see the value in adding a provision for a FRO to agree to skip a read which is implied by</p> <p>"A Network Operator is not required to read a meter...</p> <p>...or as otherwise agreed with the Retailer who is the FRO for that delivery point."</p>	<p>(d) Subject to clause 3.1.1 (f) a Network Operator must use its reasonable endeavours to read a meter at a delivery point in accordance with the scheduled read date or as otherwise agreed with the Retailer who is the FRO for the delivery point.</p> <p>(f) A Network Operator is not required to read a meter at a delivery point in accordance with clause 3.1.1(d) if the Network Operator has received, or arranged to receive in accordance with the Customer-own read (Actual) methodology, a Customer-own read (Actual) for that meter in accordance with that scheduled read date or as otherwise agreed with the Retailer who is the FRO for that delivery point</p>	<p>In relation to 3.1.1 (d) AEMO does not support the deletion of the words "reasonable endeavours" as this is not part of the scope of this proposal. These "reasonable endeavours" provisions appear through-out the NSW/RMPs. There is a separate initiative on the on the retail market issue/change register, IN005/15 that mentions that the use of the term "Reasonable endeavours" is potentially being used inconsistently throughout the RMPs including VIC and QLD RMPs. This initiative proposes a review of all RMPs is proposed to remedy any potential inconsistencies, therefore this proposal to amend this provision would form part of the IN005/15 scope.</p> <p>In relation to 3.1.1 (f) which Red/Lumo proposes to delete the word "or as otherwise agreed with the Retailer who is the FRO for that delivery point" AEMO does not support as it is an existing provision in (d) and is not part of the scope of this proposal.</p>
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17	OE	3.1.1 (f)	<p>Origin has previously expressed concerns with clause 3.1.1 (f) as that there is no obligation on the Network Operator to visit the site once the customer is placed on a self-read cycle. Whilst it is acknowledged that access to the meter may be difficult, the Network Operator can communicate to the customer the requirement to access the meter at least once a year for safety reasons. Foremost, unhindered access to the meter by the Network Operator needs to be promoted and not seen now as less important. It is recommended that an obligation for a standard meter read visit at least annually is included within procedures.</p>		<p>In relation to Origin Energy comment about a requirement to access the meter at least once a year for safety reasons, it is AEMO view is RMP provisions only deals with obligations for the Network Operator to read meters. Matters pertaining to Network Operator asset management and compliance with The Gas Supply (Safety and Network Management) Regulation 2013 isn't within AEMO remit. Concern or issues of the nature should be directed to JNG.</p>
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18	AGL	3.1.1 (f)	<p>AGL has concerns that this clause absolves an operator from having to arrange, or attempt to arrange, a physical visit a site on some regular cycle to ensure that the provided meter reads are correct and that there has been no damage or tampering with the gas meter.</p> <p>It has been argued that these sites are Chronic No Access and that the network would not be able to access the meter anyway. AGL would argue that if customers are providing CoRs then they are engaging with the network and would accommodate a scheduled cyclic visit – eg every 12 to 24 months.</p>		<p>In relation to AGLs comment about the condition of the meter please refer to AEMO response in ref# 17.</p> <p>In relation to comments in the second paragraph, AEMO is unclear why AGL considers that the Network Operator needs visit site either annual or bi-annually given the fact the Network Operator is providing regular meter reading to the Retailer which is essentially the scope that the Network Operator needs to fulfil under the RMP. Anything beyond that outside of AEMOs remit.</p> <p>It is also worth noting the procedures (clause 3.1.4) allows for a Retailer to request a special read. This can be used if the Retailer wishes that a Network Operators representative to read the meter which allows Retailer to address any cyclic visit.</p>
19	JGN	Cl. 3.1.1(g):	'meet' needs to be 'met'		<p>AEMO agrees and has change the word to "met"</p> <p>See ref # 19a</p>
19a	JGN	Cl. 3.1.1(g):	Several minor changes to improve the clarity of this clause		AEMO agrees and has change the word
20	JGN	Cl. 3.5.1(f):	Suggest 'Unless' instead of 'except when'		AEMO agrees and has change the word to "Unless"



21	AGL	3.5.1(j)	Noting the discussion regarding Cor(A) flags on page 4, the note attached to (j) and the fact that a valid CoR(A) would be marked as an Actual (A), AGL is unclear why (j)(iv) requires 'a flag indicating the <i>reading</i> was a <i>Customer-own read (Actual)</i> '.	Delete clause (j)(iv).	AEMO does not support the proposal to delete text "a flag indicating that the reading was a Customer-own read (Actual)". This provision dovetails into the Clause 2.2 (a) (viii) (E) that requires the Network Operator to record the information used to verify that meter reading meets the Customer-own read (Actual) criteria. (See AEMOs response in ref #12)
21a	AEMO	3.5.4 (e) and (f)	AEMO has added new clause that the Network Operator must provide report to the FRO on Customer-own read (Actuals).		AEMO has made this change. See also ref # 35.
22	OE	Additional Clause	<p>It has been noted, that JGN will introduce a secure self-reporting tool for Retailers to access. This report will include details on actual reads submitted (including allowing the Retailer to view the submitted photograph).</p> <p>Origin recommends a clause within procedures for reporting information to be updated within two business days after validation of the Customer-Own Read (actual). Reporting to include access to view submitted photographs and information such as number of customers on self-read cycle and how many reads have transpired to actuals for meter read provision and billing.</p>		See AEMO response ref#35



23	AGL	3.5.1 (j)	<p>While AGL supports the Network’s proposals to gain better quality meter data, AGL continues to object to the practice of classifying some customer provided meter reads as an Actual.</p> <p>There are secondary processes (eg customer enquiries, complaints, customer letters to gain access) which require clarity of the source of the meter data.</p> <p>If the meter read is validated and provided as a Customer-Read type (ie a ‘C’) then the network bill will be processed and the customer will be billed, and should not object as they provided the meter read.</p> <p>AGL sees no additional benefit for changing the meter read type classification.</p> <p>As no retailer can understand the whole picture of customer reads, CoR(A)s etc, AGL would strongly suggest that AEMO work with the network to provide some monthly indicators of Meter Read types, in particular calling out CoR(A)s to clarify the market volume of these and other read types.</p>		<p>AEMO note AGL objections to the practice of treating certain customer provided meter reads as an actual. AEMO also notes that AGLs PPC response didn’t oppose AEMO’s view that the benefits will outweigh the cost.</p> <p>It is also worth noting that no other retailer or JGN has objected to this practice during this consultation or any of the pre-consultation.</p> <p>See AEMO’s response in ref # 22 and 35 in relation the Network Operator providing reports.</p>
COR (Actual) Methodology					
24	AGL	5 (a)	<p>AGL is unsure if the ‘and’ at the end of clause (a) is appropriate as this generally indicates that the two clauses are operating together to form a joint criteria, rather than separate criteria.</p>	Delete the ‘and’.	Section 5(a) and (b) work together as to when an arrangement starts and ends.



25	Red/ Lumo	5. ARRANGEME NT TO RECEIVE A CUSTOMERO WN READ (ACTUAL).	<p>Red and Lumo strongly suggest the following to clarify that 3.1.1(f) no longer applies if the customer fails to uphold the arrangement to submit a Customer-own read (Actual) which can be validated.</p> <p>The proposed clauses defining the requirement for a Network Operator to read a meter at a delivery point are circular and potentially allow a Network Operator</p> <p>to;</p> <ul style="list-style-type: none"> . Have an arrangement with a customer . Have an arrangement end, which requires the network operator to; . Read the meter, subject to arranging to receive a read from the customer; 	<p>(b) A Network Operator’s arrangement with a Customer to receive a Customer-own Read (Actual) from that Customer ends if the Customer:</p> <ul style="list-style-type: none"> (i) informs the Network Operator they no longer intend to submit a Customer-own read (Actual); (ii) fails to provide a Customer-own read (Actual) to the Network Operator for two consecutive scheduled read dates; (iii) provides a Customer-own read (Actual) which is not a validated meter reading for two consecutive scheduled read dates; or (iv) fails to provide a Customer-own read (Actual) to the Network Operator for a scheduled read date and provides a Customer-own read (Actual) which is not a validated meter reading for the next scheduled read date or vice versa <p>Note: If a Network Operator’s arrangement with a Customer to receive a Customer-own read (Actual) ends, the Network Operator must use its reasonable endeavours to read the Customer’s meter in accordance with clause 3.1.1(d) of the RMP NSW AND ACT for the next scheduled read date immediately after the arrangement ends. For the avoidance of doubt, clause 3.1.1(f) no longer applies in this circumstance</p>	<p>AEMO is unsure of the issue raised by Red/Lumo.</p> <p>Each sub-section in 5(b) apply independently.</p> <p>Therefore, for example, if the customer does not provide a customer own read for 2 consecutive reads, the arrangement automatically ends.</p>
26	AGL	5 (b)	<p>The criteria for the arrangement ending with the customer should also include the customer failing to provide the <i>Customer-Own Read (Actual)</i> electronically as required by clause 6.</p>	<p>(v) fails to electronically provide the <i>Customer-Own Read (Actual)</i> directly to the Network Operator.</p>	<p>AEMO does not support the proposal to add the suggested clause because the definition <i>Customer-Own Read (Actual)</i> is linked to the definition of <i>Customer-own read Criteria</i> which links Customer-own read (Actual) methodology where by 5 (a) state the customer has electronically submitted.</p>



27	OE	Additional Clause	<p>Include an obligation for the Network Operator to update their systems and reinstate the site back to a physical meter read route (ie. not a self-read cycle) by two business days after the second failed Customer Own Read (Actual). This provides an important obligation and control on the expected shifts from self-read cycles to physical read cycles.</p>		<p>AEMO does not support the need for a additional obligation because the arrangement for a customer-own read (Actual) ends immediately if any of the sub-section in 5(b) apply.</p>
28	Red/ Lumo	6. CRITERIA	<p>Red and Lumo consider it would be more preferable for the 'applicable read window' to align with the Meter reading frequency.</p> <p>The proposed timing differs by increasing the read window to 91 days plus 2 days or minus 4 days.</p> <p>To ensure consistency we would like to see this aligned with;</p> <p>3.1.5 Meter reading frequency</p> <p>(d) for non-daily metered delivery points with meters</p> <p>read quarterly – 91 days plus or minus 2 business days</p>	<p>(b) submission of the information specified in paragraph (a) occurs during the applicable read window, being no earlier than 42 business days before the scheduled read date, and no later than 2 business days after the scheduled read date</p>	<p>AEMO does not support the proposal to change this to 2 days. The read window is aligned to that applied to meter reader reading routes. The minus 4 business days is for operational purposes and maintains a standard between a read provided under the COR (A) methodology and meter reader routes.</p>



29	AGL	6	<p>This clause only requires the information to be submitted electronically, as opposed to being provided via the app.</p> <p>AGL notes that in clause 5 the use of the network mobile app seems to be just one mechanism for entering into the CoR(A) arrangement.</p> <p>AGL seeks to understand the following:</p> <ol style="list-style-type: none"> 1. if a photograph is submitted via e-mail or some other electronic platform whether it will meet the requirements of this methodology and <p>whether the network mobile app is also using embedded metadata to validate the photograph and the date / time the photograph was taken.</p>		<p>Customer registering to submit Customer-own read (Actual) to the Network Operator with a mobile application. The mobile applications currently the only avenue for customers to enter an arrangement. This is consistent with the temporary process that has been operating in JGN network sections since mid-2020.</p> <p>However, the criteria of submission of a Customer-own read (Actual) is technologically neutral and other electronic means of submitting Customer-own reads could be a customer-own read (Actual) if all other requirements and criteria are met.</p> <p>In relation to embedded metadata validation, this is not currently prescribed in either the RMPs of COR (A) methodology nor is it part of the temporary process that has been operating in JGN network sections since mid-2020. AEMO has received advice from JGN that embedded metadata to validation would add a level of complexity into both JGN systems and the customer interaction. A new Gas Market Issue (GMI) will need to be raised to consider adding this type of validation.</p>
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30	AGL	6	AGL does not believe that this clause is adequate, and should include aspects of clause 7(b).	<p>Include additional sub-clause</p> <p><u>(c) the photographs submitted by the Customer as supporting information is of sufficient quality that the applicable meter number and meter index are clearly legible; and</u></p> <p><u>(iii) the read by the Customer and the current photograph (of the meter index and meter number) are consistent.</u></p>	<p>AEMO does not support this proposal because these additional sub clauses are unnecessary over prescriptive. The validation process in 7 provide the necessary check and balances.</p> <p>Given the process has been operational for a considerable period, and if AGL can provide evidence (<i>number of occurrences and materiality</i>) to substantiate current clauses are inadequate, AEMO will reexamine its position on this matter.</p>
30	AEMO	6 (a)		After the words "current photograph of the meter" and before the words "showing", add the words "clearly".	AEMO has amended the Customer-own read (Actual) Methodology by adding a requirement for the photo to be "clear" in the criteria for a customer-own read (Actual). This ensures each photo clearly shows the index number and meter number.
31	JGN	Cl.6(b):	In 2nd line, de-italicise "the" in before "the scheduled read date"		AEMO agrees and has made this change.



32	Red/ Lumo	7. VALIDATION. (b)	<p>Red and Lumo strongly oppose the suggestion that a Network Operator have an alternate validation methodology as proposed in clause (b).</p> <p>Clause (b) states that a Customer-own read (Actual) which fails to meet an approved validation methodology may be validated by a Network Operator under their own, undisclosed criteria. If the read provided by the customer does not meet both the criteria and the approved validation methodology then the read must be published as an estimate and the network operator should undertake an actual reading of the meter as described in RMP clause 3.1.1 (d).</p> <p>The validation methodology must be clearly defined for the benefit of customers and retailers alike, especially considering that an actual meter reading</p>	<p>a) A validated meter reading for a Customer-own read (Actual) (as determined by application of the requirements in clause 6) is:</p> <p>(i) a Customer-own read (Actual) that has been validated by the Network Operator in accordance with the approved validation methodology; or</p> <p>(ii) where the approved validation methodology has not been satisfied, if the Customer-own read (Actual) is validated by the Network Operator in accordance with paragraph (b);</p> <p>(b) If a Customer-own read (Actual) does not satisfy the approved validation methodology, the Network Operator may validate the read undertaken by the Customer taking into account:</p> <p>(i) the meter reading history;</p>	See AEMO response in Ref #11 and 33.
33	AGL	7 (b)	<p>AGL does not support a customer Own Read being validated through non-prescribed mechanisms as described in this sub-clause.</p> <p>AGL would expect that the <i>approved validation mechanism</i> referred to in clause 7(a) would include comparison and extrapolation to the meter reading history.</p> <p>The quality matching of photograph to the provided index read should be seen as criteria [eg Clause 6] for the submitted read to be considered for processing.</p>		See AEMO response ref #11 and 32



34	AGL	General	<p>There was discussion about the Network providing supporting information to retailers on which reads were CoR(A) including provision of the photograph.</p> <p>None of this has been included in either the methodology or procedure.</p>	<p>Include a new section 8 on Supporting Information which would specify:</p> <ul style="list-style-type: none"> •the type of information to be retained <ul style="list-style-type: none"> o photograph o MIRN o Date etc •The format for the information (to ensure a standard is maintained to allow automated processing and recording / data access and matching) •the obligation for the network to retain this information for the same period (7 years) and in the same accessibility as meter data (ie easily available or archived); • process to make this information easily available to AEMO or the relevant FRO; 	<p>In relation to the Network Operator creating, maintaining and administer information related to a COR (A) clause 2.2 (a), (viii) (E) places a obligation on the Network Operator to hold the information used to verify a COR (A) therefor a section in the COR (A) methodology is not required. AEMO also doesn't support the proposal to specify each attribute within the RMPs as suggested by AGL. There are other examples of basic core element is listed but the sub attributes aren't prescribed. Example – using meter as a core element as an example, the sub attributes such as, the number of dials, the meter range, the meter manufacturer etc</p> <p>In relation to process to make information available should be no different to that of any other read type. The Gas ROCL provides contact details for information about meter reading enquires.</p>
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35	AGL	General	<p>There is no obligation on the Network to prepare and provide information to the market around this arrangement or individual retailers of the number of customers active within this CoR Arrangement, the number and MIRNs who are active, the number and MIRNS who have left the arrangement and other relevant KPIs.</p>	<p>Add a new section 9, on market reporting, including general market information as well as specific information relevant to the affected retailer.</p> <p>This might include, for example:</p> <p>Market Information</p> <ul style="list-style-type: none"> • Number of active customers • Number of exit customers • Average number of months to customer's exit <p>Retailer Information</p> <ul style="list-style-type: none"> • Active MIRNS • Date commenced • Date Exited • Total number of adjusted readings 	<p>AEMO supports AGL's and OE's (ref #22) about including provisions about Customer-Own Read (actual) reporting. AEMO has had further discussion with JGN about reports. JGN advised that they are currently providing to retailers each month and that this process will continue.</p> <p>Given the above AEMO has added a new section (section 8) to the COR (Actual) Methodology and new RMP clauses 3.5.4 (e) and (f). This new section provides details about what information the reports must contain.</p> <p>In relation to RMP clause 3.5.4, this contains the obligation that JGN is to provide the retailer with a report on COR (A)s. It also set out that the format, timing and method of delivery will be agreed by Network Operator in consultation with Participants.</p> <p>In relation to what the reports are to contain, AEMO has used the current report as the baseline to prepare the details in section 8. Because the scope of this initiative is about aligning the RMPs with the temporary process that has been operating in Jemena Gas Networks (JGN) network since mid-2020 any requests to amend the current report details is not within the scope of this change.</p> <p>A new Gas Market Issue (GMI) will need to be raised to consider any amendments to the content.</p>
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					See ref #22 and 23.
36	AGL	Flowchart of Criteria and Validity	<pre> graph TD Start([Start]) --> P[Passes Validation] subgraph CoR_A_Validation [CoR(A) Validation] P end P -- NO --> NE[Network Estimate] P -- YES --> H[Has a Photo] subgraph CoR_A_Criteria [CoR (A) Criteria] H --> SE[Submitted Electronically] SE --> SRW[Submitted in Read-Window] end SE -- NO --> CoR[CoR] SRW -- YES --> CoRA[CoR(A)] </pre>		The Procedures have been drafted on the basis that the Criteria applies before the Validation.
General comments					



37	AGL	General	<p>(1) AGL supports JGN in their mission to reduce the impacts of chronic no access sites and the onflow effects of inaccurate billing.</p> <p>(2) However, we would like to ensure these processes are well developed, retaining customer safety at the forefront. Therefore, for clarity we are requesting you consider recording of the COR reads as "C" in market.</p> <p>(3) It should be noted that the JGN records process should ensure that a suitably qualified person undertakes any review of photographic information before it is validated and then submitted it as an Actual Reading "A"</p> <p>(4) AGL also strongly believes that JGN should still access the site periodically (perhaps this could be increased to 24 months instead of current 12 months) to ensure the ongoing safe operation of the meter. Noting customers engaging in COR provision, will also be easier to engage in setting up an appointment to access the site periodically</p> <p>(5) AGL expects that COR sites masked as Actual, will also lead into an increase in DNP/DNI failures due to no access and non-payment of some bills which will result in increased operational costs for retailers and customers. This will result in related failed service notification fees being charged (for all requests not just AMLs). Is JGN proposing to cease charging of these fees in this instance ?</p> <p>(6) Further, where the network cannot take action to complete an AML, will JGN continue to charge network connection fees ?</p>		<p>(1) AEMO notes AGL support to reduce the impact of estimate reads.</p> <p>(2) In relation to safety concerns see AEMO response ref # 17. In terms of the assigned the value for the field "Type_of_Read" in the Meter Data Notification (MDN) transactions the corner stone which was agreed very early in the pre-consultation that customer-own reads (Actuals) will be assigned "A" Change this foundation condition so that is assigned as a "C" introduces AEMO system changes as well as system changes for JGN and retailers. Changes of the nature can be substantially more costly therefore AEMO does not support this proposal.</p> <p>(3) The qualification and suitability who JGN employees to oversee this process is beyond AEMOs remit.</p> <p>(4) See AEMO response ref #18.</p> <p>(5) Given that the process of treating CORs has been operational for at least 6 months under a no action arrangement from the AER, AGL should have a reasonable understanding of the magnitude of the increase cost and if that material then AGL include the second round (IIR). What the Network Operators changes for various service request is beyond AEMO remit so AGL should raise this matter with JGN.</p> <p>(6) See the last paragraph in (5).</p>
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			<p>(7) As has been noted previously, Retailers also have back billing provisions to keep in mind when considering a proposal such as this. The proposed "A" reading would limit our ability to recover any incorrect charges / adjusted reads resulting from misallocated CoRs within the period allowable (9 months).</p> <p>This may have customer implications for catch up bills and can drive hardship issues.</p> <p>Being able to correctly identify if the reading is from a trained meter reader vs a customer is useful in providing support and education to customers, managing queries, disputes and complaints</p> <p>(8) Lastly COR marked as A limits our ability to have effective triage conversations with customers. Without the ability to know what was information was provided by the customer and what was truly an actual, our agents will struggle to problem solve if bills are high, or reads are disputed.</p>		<p>(7) AEMO is unclear about the issue AGL is advocating other to note that in the last paragraph AGL could ask JGN to provide information such as the photograph.</p> <p>(8) Given that the process of treating CORs has been operational for at least 6 months under a no action arrangement from the AER, AGL should have a reasonable understanding of the magnitude of the in term of how problematic the problem solving is if AGL feels that material then AGL should include this in second round (IIR). Also see AEMO response ref #22.</p>
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