

IMPACT & IMPLEMENTATION REPORT (IIR)

Issue number	Package 1 - 2023 (IN008/19, IN011/15, IN011/22, IN006/22, IN008/22)		
Impacted jurisdiction(s)	Victoria, Queensland, SA and NSW/ACT		
Proponent	See table in section 3.1 grcf@aemo.com.au	Company	N/A
Affected gas market(s)	Retail		
Industry consultative forum(s) used	GRCF	Date industry consultative forum(s) consultation concluded	Friday, 25 November 2022
Short description of change(s)	Minor changes to the Retail Market Procedures (RMP) to introduce flexibility regarding the timing of Customer Own Reads (COR). This IIR also includes other non-controversial initiatives that involve aligning documentation with existing operational processes, remove redundant processes and progress industry's broader program of work to harmonise the various jurisdictional retail documentation.		
Procedure(s) or documentation impacted	Victorian RMP version 16.0, SA RMP version 19.0, NSW/ACT RMP version 28.0, QLD RMP version 20.0, Register of Weather Related Information version 3.0.		
IIR prepared by	Jordan Daly	Approved by	Meghan Bibby
Date IIR published	19 January 2023	Date consultation concludes	9 March 2023
Email address for responses	grcf@aemo.com.au		



IMPACT & IMPLEMENTATION REPORT (IIR) – DETAILED REPORT SECTION

1. DESCRIPTION OF ISSUE

The RMPs are currently restrictive with regards to the timing of the provision of Meter Reading Information when provided via a Customer Own Read (COR). IN008/19 intends to address this by allowing retailers and network operators an option to agree on a time and frequency by which to provide this information. This is driven by an increase in the availability of mechanisms for customers to provide their own meter reading.

In relation to the other initiatives¹ contained in this IIR, AEMO has identified certain RMP provisions that are not properly aligned with operational processes, or the process has become redundant, yet the RMP provisions still mentions this misaligned or redundant process. There is also one initiative whereby a participant has identified that some definitions are inconsistent between each RMPs, with no basis for this.

Section 3 of this IIR contains further information about each of the above issues and a brief explanation of the specific changes. Attachment A of this IIR contains amendments for each of the proposed changes.

1.1. Submission instruction to this second stage consultation

Anyone wishing to make a submission for this second stage consultation stage are requested to use the response template provided in Attachment B. Submissions close COB 17 February 2023 and should be emailed to grcf@aemo.com.au.

1.2. Scope of changes.

IMPORTANT: The scope of works is limited to the initiatives described above. The scope does not include WA. The scope maybe expanded to pick up other minor typographical errors that are identified. A more thorough review of the other clauses of the RMPs is out of scope for this consultation.

2. REFERENCE DOCUMENTATION

- [Retail Market Procedures \(VIC\) 16.0](#)
- [Retail Market Procedures \(QLD\) 20.0](#)
- [Retail Market Procedures \(NSW-ACT\) 28.0](#)
- [Retail Market Procedures \(SA\) 19.1](#)
- [Register of Weather-Related Information 3.0](#)

3. OVERVIEW OF CHANGES

As outlined in Section 1, this IIR is made up of several existing initiatives, each having their own specific change as described in Attachment A. The changes are mostly minor rewording of some existing clauses so that they use language/terms consistent with that used in other east coast RMPs and compliance-related updates to drafting. It is AEMO's view that none of these changes significantly alter any of the existing obligations placed on participants. It is envisaged that the above should contribute to AEMO's and industry's long-term aim to increase consistency between the regulatory frameworks for all east coast retail gas markets.

AEMO is targeting to have the formal consultation processes concluded in early 2023 with the proposed amendments to come into effect 31 March 2023 should they be approved by AEMO.

¹ See the table in section 3.1 of this IIR excluding IN008/19.



3.1. Proposed changes

The following table indicates which initiative affect which Procedures. The clauses of each document that have been updated have had a colour-coded comment applied to them indicating which initiative is related to which change of drafting.

Change ID	Title	Proponent	Documents affected
IN008/19	Customer Own Reads (COR) Amend RMPs to have alternate timeline	AGL	NSW/ACT RMP SA RMP VIC RMP QLD RMP
IN006/22	Redundant provisions removed from QLD RMP	AEMO	QLD RMP
IN011/22	Compliance resolution. Remove Clause 3.3.2(d) that required AEMO to provide a report to all participants, shippers and transmission pipeline operators	AEMO	SA RMP
IN008/22	Compliance resolution. Update the Register of Weather Related Information to accommodate third party vendors Compliance Resolution	AEMO	Register of Weather Related Information NSW/ACT RMP
IN011/15	Harmonise the definition of Actual Metering with NSW/ACT and SA	Red/Lumo	VIC RMP QLD RMP

The proposed changes are:

COR Amend RMPs to have alternate timeline (IN008/19).

- Adds a new provision to existing RMO timing provision that enables parties to agree such timings.

Harmonise the definition of Actual Metering Reading with NSW/ACT and SA (IN011/15).

- Redefines 'actual meter reading' for Victoria RMP, Queensland RMPs to harmonise them.

Redundant provisions removed from QLD RMP (IN006/22).

- Removes reference to 'sufficient financial standing' and clause 1.2 'Registration with AEMO' in the Queensland RMP.

Clause 3.3.2(d) Review Compliance Resolution (IN011/22).

- Removes clause 3.3.2 (d) from the SA RMP. The clause required AEMO to provide a report to all participants, shippers and transmission pipeline operators stating the number of days in the month in which estimated gate point metering data was provided under paragraph 3.3.2 (c). This report is not needed by the market.

Update the Register of Weather Related Information to accommodate third party service providers Compliance Resolution (IN008/22). This is a compliance-related matter that ensures the RMP and Guide reflect AEMO's business practices.

- Amended Appendix 2.3 of the NSW RMP to reflect the fact that when there is no physical sensor to obtain sunshine hour values, these are derived from meter and synoptic data based on cloud cover at the specified weather stations(s) for NSW in much the same way as is currently done for the ACT.



- Added a footnote to Section 6 - NSW and ACT Weather Related Information of the Register of Weather Related Information² highlighting the fact that AEMO uses a third-party service provider for its weather data, but this data is originally sourced from the Bureau of Meteorology.

See Attachment A for further information about these changes.

4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

Inclusion of the proposed Procedure changes will improve compliance and consistency across jurisdictions. This reduction of administrative burdens will allow participants to operate in an effective and efficient manner, which meets the Objectives of the NERR and NGR.

Not making the amendments to the various RMPs is likely to leave participants open to administrative non-compliances in this matter or force excessive data provisions which neither party needs nor wants. Further unnecessary processing and delivery of information may be required if procedure changes are not made, or time and energy would be wasted due to management of administrative non-compliances. If the changes identified in this IIR do not proceed, then process improvements to harmonise the east coast RMP will not be attained, and as such, the benefit of clearer and more streamlined procedures will not be realised.

Since all changes with a material impact on AEMO's market or IT systems have been excluded from this consultation, there should be minimal implementation requirements for participants or AEMO as a result of this consultation.

5. OVERALL COSTS AND BENEFITS

AEMO expects there will be negligible implementation costs since none of the changes proposed in this IIR require system changes or substantial process changes and considers this change to be noncontroversial. If a participant believes that any of the proposed changes are controversial, this feedback needs to be included in the Attachment B response template.

With regards to IN008/19, not making the amendments to the various RMPs is likely to leave participants open to administrative non-compliances in this matter or force excessive data provisions which neither party needs nor wants. Further unnecessary processing and delivery of information may be required if procedure changes are not made, or time and energy would be wasted due to management of administrative non-compliances. If the changes identified in this IIR do not proceed, then process improvements to harmonise the east coast RMP will not be attained, and as such, the benefit of clearer and more streamlined procedures will not be realised.

With regards to the proposals as a whole, the benefits are intangible in nature and are likely to be realised as follows:

- Increased consistency within the retail gas regulatory framework.
- More uniform RMP across all jurisdictions will reduce the complexities normally associated with entering gas retail markets, particularly for those retailers wanting to operate in more than one jurisdiction.
- Increased readability of the RMPs.
- Reduces costs by lowering the unnecessary additional processing and storage of COR data.

² Register of Weather Related Information is a guide that has its own change process for amendment and is therefore not part of the consultation process described in Part 15B of the National Gas Rules. It is included in this consultation for context.



6. MAGNITUDE OF THE CHANGES

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

7. CONSISTENCY WITH NATIONAL GAS RULES (NGR) AND NATIONAL GAS OBJECTIVE (NGO)

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

Consistency with National Gas Law (NGL) and NGR	AEMO's view is that the proposed change is consistent with the NGL and NGR because the proposed changes properly reflects operational practices and promotes consistency across the four east coast jurisdictions.
National Gas Objective	As outlined in Section 6, it is AEMO's view that this change removes any costs associated with unnecessary differences in process and procedures and is in the long-term interests of consumers as it promotes clarity and consistency for gas retail market participants.
Any applicable access arrangements	AEMO's view is that the proposed change is not in conflict with existing Access Arrangements.

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

The PPC was issued on 23 November 2022 and submissions in response to it were due by COB 14 December 2022. 6 submissions were received from the following organisations, AGL, AGN, Energy Australia, Jemena and Origin Energy (Origin), Red Energy/Lumo Energy (Red/Lumo).

None of these submissions objected to most of the proposed changes.

Energy Australia and Red/Lumo did not support the IN008/19 Customer Own Reads proposal as they believe it risks being overly complex and creating unforeseen consequences. However, as these are proposed to be bilateral agreements between retailers and distributors, this effectively means that if parties chose not to opt in, then the status quo holds sway. This means all the existing provisions that apply today prevails. On that basis AEMO is proposing to retain the existing drafting as outlined in the PPC.

AGL, AGN and Red/Lumo also proposed several amendments to update the RMPs and improve consistency across jurisdictions. These have been detailed in Attachment C. The further amendments made by AEMO are:

- Several clerical edits have been made to the VIC RMP so that words have the same formatting as their definitions in the document.
- The definition of 'customer-own read' in the QLD RMP now also refers to the distributor. This was flagged by the QLD distribution business (see attachments please see ref #37) and this additional change effectively aligns the QLD RMPs with QLD operational practices, namely that Customer Own Reads can currently be submitted to the Retailer or Distributor in that jurisdiction.
- Section 3.5.2 of the SA RMP was incorrectly track-changed. This has been rectified.



- The NSW/ACT RMP has been updated to reflect the fact that 'index reading' is not a defined term.
- The Register of Weather-Related Information now refers to a 'Source of Data' rather than the specific 'Service Provider' with regards to the origin of its weather related information.

Please see Attachment C 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.

10. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO is targeting to implement this change on 31 March 2023.

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

- Issue Impact and Implementation Report (IIR) on 19 January 2023.
- Submissions on IIR close 17 February 2023.
- Issue AEMO decision 9 March 2023.
- Target effective date is 31 March 2023.



ATTACHMENT A – MARKED UP CHANGES (SEE SECTION 3)

Draft versions of the RMPs showing tracked changes between the current version and the proposed changes are attached separately to this document. Blue underline means addition and ~~red-strikeout~~ means delete.

- Vic RMP.
- SA RMP.
- NSW/ACT RMP³.
- QLD RMP.
- Register of Weather Related Information.

ATTACHMENT B – IIR RESPONSE TEMPLATE

The IIR response template has been attached separately to this document. There are two sections in the template:

- Section 1 seeks feedback on AEMO's examination of the proposal in Sections 1–9 (i.e., whether AEMO has correctly captured the requirements and surrounding context of the proposal)
- Section 2 seeks feedback on the proposed changes listed in attachment A.

Anyone wishing to make a submission to this IIR consultation are to use this response template. Submissions close COB 17 February 2023 and should be emailed to grcf@aemo.com.au.

³ The NSW/ACT RMP show the mark-ups that relate to the IN011/21 (BL and TSF changes) consultation. These mark-ups are not part of the Package 1 (2023) consultations. A decision on these changes was published on 11/02/22. For further information, see the consultation page [here](#).



ATTACHMENT C – FEEDBACK GIVEN TO PPC

Section 1 - General Comments on the Proposed Procedure Change

IN#	Ref #	Participant	Response	AEMO Response
IN008/19	1.	AGL	<p>AGL supports these proposed amendments</p> <p>AGL notes that the definition of Customer Own Read (CoR) varies between the jurisdictions and may or may not consider the mechanism or the party who provides the CoR.</p> <p>As this is the core of the Proposed Change, AGL considers that this is a reasonable opportunity to align the definitions for consistency across the jurisdictions, while removing any specificity in relation to the party or process used to provide the CoR (eg writing, phone etc).</p> <p>There are multiple mechanisms available and this definition should be agnostic to those mechanisms and to the party who provides a CoR (ie retailer or customer). See below for some examples.</p>	<p>AEMO notes AGL’s support for the proposal.</p> <p>AEMO does not believe further changing the definition of COR across every jurisdiction is ‘core’ to the change.</p> <p>To look at every jurisdiction’s definition of COR is outside of the scope of this consultation. Further, given the scope was agreed up front at the October 2022 GRCF and the fact that the first stage consultation has subsequently concluded, and that this consultation now moves into the AEMO recommendation phase⁴, it would be inappropriate for AEMO to add further drafting change to the extent suggested by AGL namely because participants wouldn’t have been allowed sufficient time to consider the consequences of such additional changes that’s beyond the core of the original proposed change. Noting the above, IN008/19 can be progressed as part of this consultation, and a broader review of COR definitions can occur outside of it. Please see AEMO’s responses to AGL’s suggested RMP changes below.</p>
	2.	AGN	AGN supports AEMO’s assessment	AEMO notes AGN’s support for the proposal.
	3.	Energy Australia	EA does not agree with the proposal of multiple parties internally agreeing on the timings of the customer’s own reads, we feel this would complicate and create too much confusion in tracking different business requirements of participants in the market.	AEMO notes Energy Australia’s comment. As the proposal requires bilateral agreement, participants are able to not opt-in to them.
	4.	Jemena	Jemena supports this change. Jemena would like to have on record that any agreement between parties will require consideration of a number of factors such as customer experience, customer communications, cost of implementation, ongoing cost of maintaining different meter read processing rules for different retailers. As a distributor, Jemena seeks to maintain a uniform level of service for all retail partners.	AEMO notes Jemena’s support for the proposal.
	5.	Origin	Origin supports this change to the applicable RMPs.	AEMO notes Origin’s support for the proposal.
	6.	Red/Lumo	Red Energy and Lumo Energy (Red and Lumo) do not support AEMO’s assessment of IN008/19. The current requirement ensures prompt action by a retailer and a distributor to provide consumers with billing on a validated customer-own read in the event that a distributor fails to read the meter. In	AEMO notes Red/Lumo’s comment. As mentioned in Section 5 of the PPC, if the procedure changes are not made, time and energy may be wasted due to management of administrative non-compliances. Making this change will allow participants to operate in an

⁴ Section 5 (h) of the Approved Process (under rule 135EC of the NGR) requires a IIR to include a recommendation proposed changes should be made “with” or “without” amendments. In the case of “with” changes AEMOs standard approach is to limit such changes to just the nucleus of the original proposed change.



			<p>accordance with the guidance published by their retailer or distributor, the customer-own read should be accepted or rejected in a timely manner, not 'at a time and frequency agreed by the parties.'</p> <p>The proposed change provides no benefit to consumers by allowing retailers and distributors to agree to an alternate timeline nor is a benefit of this change detailed in the PPC. Additionally there is a risk that the proposed change may result in retailers and distributors incurring costs to accommodate the change which does not meet the national gas objective.</p>	<p>effective manner. For example, the proposal avoids unnecessary additional processing and delivery of COR data. Currently, there are additional costs on parties to manage the receipt and storage of unnecessary volumes of meter data.</p> <p>With regards to the published guidance, AEMO's preliminary assessment is that there is no clash between this proposal and the National Energy Retail Rules and the Victorian Energy Retail Code of Practice. This is because these documents do not pertain to the obligations relating to a DB and RB providing a COR to each other.</p> <p>As the distributors and retailers can agree on alternative timelines for COR acceptance this provides efficiency improvements for the parties that opt in to the proposed change. If parties chose <u>not</u> to opt in, then the status quo holds sway meaning all the existing provisions that apply today prevails. Additionally, any risk of greater system costs would be ameliorated by the fact this arrangement requires bilateral agreement.</p>
IN006/22	7.	AGL	AGL supports these proposed amendments	AEMO notes AGL's support for the proposal.
	8.	AGN	AGN supports AEMO's assessment	AEMO notes AGN's support for the proposal.
	9.	Energy Australia	Agree	AEMO notes Energy Australia's support for the proposal.
	10.	Origin	Origin Supports this change recognising that financial viability assessment is undertaken by AEMO as part of the Registration application process.	AEMO notes Origin's support for the proposal.
	11.	Red/Lumo	Red and Lumo support the assessment of IN006/22	AEMO notes Red/Lumo's support for the proposal.
IN011/22	12.	AGL	AGL supports these proposed amendments	AEMO notes AGL's support for the proposal.
	13.	AGN	AGN supports AEMO's assessment	AEMO notes AGN's support for the proposal.
	14.	Energy Australia	Agree	AEMO notes Energy Australia's support for the proposal.
	15.	Origin	Origin supports the removal of clause 3.3.2(d) in the SA RMP.	AEMO notes Origin's support for the proposal.
	16.	Red/Lumo	Red and Lumo support the assessment of IN011/22	AEMO notes Red/Lumo's support for the proposal.
IN008/22	17.	AGL	AGL supports the proposed change – but notes that the table in the procedure could be amended to say 'Source of Data' rather than 'Service Provider', as that was the original intent and is the crucial information.	AEMO notes AGL's support for the proposal. The suggested change is consistent with the intent of the initial amendment and improves the clarity of the document. The Register has been updated accordingly.
	18.	AGN	AGN supports AEMO's assessment	AEMO notes AGN's support for the proposal.
	19.	Energy Australia	Agree	AEMO notes Energy Australia's support for the proposal.
	20.	Jemena	Jemena supports the change to allow for no sunshine sensor as it is consistent with ACT formula.	AEMO notes Jemena's support for the proposal.
	21.	Origin	Origin supports update to the Register of Weather Related Information and the inclusion of 2.3 of the NSW RMP	AEMO notes Origin's support for the proposal.



	22.	Red/Lumo	Red and Lumo provide provisional support on the condition that the column title Service Provider (of Table 2 Weather Observation Stations) needs to change or the content of the table needs to be amended to accurately reflect the parties involved. The proposed footnote does not accurately address the issue that the data is sourced from the Bureau of Meteorology but provided to AEMO by a third party.	AEMO notes Red/Lumo's support for the proposal. Please refer to the response given in ref # 17.
IN011/15	23.	AGL	AGL supports these proposed amendments	AEMO notes AGL's support for the proposal.
	24.	AGN	AGN supports AEMO's assessment	AEMO notes AGN's support for the proposal.
	25.	Energy Australia	Agree	AEMO notes Energy Australia's support for the proposal.
	26.	Origin	Origin supports the definition change to VIC and QLD RMPs	AEMO notes Origin's support for the proposal.
	27.	Red/Lumo	Red and Lumo support and welcome the assessment of IN011/15.	AEMO notes Red/Lumo's support for the proposal.



Section 2 - Feedback on the documentation changes in the Attachments of the Impact and Implementation Report.

Retail Market Procedures (VIC)					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
Definition	28.	AGL	In light of technological advances (eg Mobile Apps etc) AGL proposes that the definition of Customer Own read (CoR) be amended to make the provision of the read agnostic of method or technology and the party who provides it. AGL also notes that the definition (including this proposed amendment) is not aligned across the jurisdictions and suggests that this is an opportune time to align the definition.	customer-own read means a read undertaken by a customer of a Retailer details of which are provided by the customer by telephone or in writing to the Retailer or in writing to the Distributor for the <u>distribution area</u> in which the <u>distribution supply point</u> to which the meter relates is located.	AEMO notes AGL's comment. As described in section 1.2 of the PPC, the scope of this consultation is limited to the initiatives described the table mentioned in section 3.1 of the IIR. Amending the definition of COR isn't in the scope of works for this package therefore AGLs proposal is out of scope. Please see AEMO's response given in ref #1.
2.1.5(iiiB)	29.	AGL	Assuming the definition of CoR includes both customer and FRO, then this clause can be reduced to reflect the receipt of a Customer Own Read by the Distributor	where the <i>Distributor</i> has been provided a <i>customer own read</i> by the FRO and the <i>Distributor</i> reasonably considers the <i>customer own read</i> to be accurate, the <i>Distributor</i> must use its reasonable endeavours to provide the <i>FRO</i> with the following information;	AEMO notes AGL's comment. Please see the AEMO response given in ref #28.
2.1.5(iiiB)	30.	Red/Lumo	Red and Lumo disagree with the proposed change as the FRO is only required to provide the customer-own read in the case that the distributor has failed to read the meter. In this circumstance, the customer is entitled to prompt communication and validation of the read they have provided to ensure accurate billing, not 'at a time and frequency agreed by the parties'. Alternatively, in accordance with the guidance published by their retailer or distributor, the read should be rejected in a timely manner,	(iiiB) where the Distributor has been provided a customer own read by the FRO and the Distributor reasonably considers the customer own read to be accurate, the Distributor must use its reasonable endeavours to provide the FRO with the following information; (A) the day on which the meter was read; and (B) the validated meter reading for that meter, by 5.00 pm on the first business day following the day on which the customer own read was received by the Distributor; or at a time and frequency agreed by the parties	AEMO notes Red/Lumo's comment. Please see the AEMO response given in ref #6.



			not 'at a time and frequency agreed by the parties.'		
2.1.5 Provision of Meter Reading Information clause (vi)	31.	Red/Lumo	The clause presented in the Proposed Procedure Change appears to have been incorrectly split into (vi) and (vii) when the proposed phrase, or at a time and frequency agreed by the parties has been added. As presented; (vi) where details of a customer-own read are provided by the customer in writing to the Distributor, the Distributor must use its reasonable endeavours to provide those details to the FRO by 5.00 pm on the first business day following the day on which the Distributor received those details , or at a time and frequency agreed by the parties, (vii)and must identify the details as relating to a customer-own read; and	(vi) where details of a customer-own read are provided by the customer in writing to the Distributor, the Distributor must use its reasonable endeavours to provide those details to the FRO by 5.00 pm on the first business day following the day on which the Distributor received those details, or at a time and frequency agreed by the parties, and must identify the details as relating to a customer-own read; and	AEMO notes Red/Lumo's comment. Please see the response given in ref #6.
2.1.5(vi)	32.	AGL	Noting that technology and communication processes have moved beyond the historical use of cards to collect customer meter data, AGL proposes that the clause be generalized to remove the method by which the Customer Own Read (CoR) is provided. This allows for the use of mobile Apps or other mechanisms to be used. As long as the network accepts the CoR, then the obligation exists.	where details of a customer-own read are provided by the customer in writing to the Distributor, the Distributor must use its reasonable endeavours.....	AEMO notes AGL's comment. Please see the response given in ref #28.
2.1.5 Provision of Meter Reading Information (iiib)	33.	Red/Lumo	In the Victorian Retail Market Procedures (RMP) customer-own-read is the defined term, however clause 2.1.5 Provision of Meter Reading Information (iiib) refers to customer own read without a hyphen, contrary to the rest of the RMP. We recommend AEMO use the defined term 'customer-own read'.	(iiib) where the <i>Distributor</i> has been provided a customer-own-read <i>customer-own read</i> by the <i>FRO</i> and the <i>Distributor</i> reasonably considers the customer-own-read <i>customer-own read</i> to be accurate, the <i>Distributor</i> must use its reasonable endeavours to provide the <i>FRO</i> with the following information; (A) the day on which the <i>meter</i> was read; and	AEMO notes Red/Lumo's comment. AEMO supports Red/Lumo suggestion and will add the missing hyphen so it becomes "customer-own read"



				(B) the <i>validated meter reading</i> for that <i>meter</i> , by 5.00 pm on the first business day following the day on which the customer-own read <i>customer-own read</i> was received by the <i>Distributor</i> .	
2.2.3 Customer provided Meter Readings	34.	Red/Lumo	Red and Lumo disagree with the proposed change as the FRO is only required to provide the customer-own read in the case that the distributor has failed to read the meter. In this circumstance the customer is entitled to prompt communication and validation of the read they have provided to ensure accurate billing, not 'at a time and frequency agreed by the parties'	If, following the failure by a Distributor to read a meter, the customer of a Retailer provides the Retailer with details of a customer-own read, the Retailer must use its reasonable endeavours to provide those details to the Distributor by 5.00 pm on the first business day following the day on which it receives those details from the customer, or at a time and frequency agreed by the parties	AEMO notes Red/Lumo's comment. Please see the response given in ref #6.
ATTACHMENT 5 – APPROVED SUBSTITUTION METHODOLOGY 2.2. Type 2 Substitution Methodology	35.	Red/Lumo	The defined term is 'substituted meter reading' however this clause uses 'substitute meter reading'	2.2.5. A <i>Distributor</i> must apply the applicable average <i>heating value</i> and <i>pressure correction factor</i> to the substituted <i>consumed energy</i> to derive the substituted <i>flow</i> for the period and the relevant substitute <i>substituted</i> meter reading.	AEMO notes Red/Lumo's comment. AEMO support Red/Lumo suggestion and will replace the word "substitute" with the word "substituted".

Retail Market Procedures (QLD)					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text	AEMO Response (AEMO only)
Definition	36.	AGL	In light of technological advances (eg Mobile Apps etc) AGL proposes that the definition of Customer Own read (CoR) be amended to make the provision of the read agnostic of method or technology. The definition is also amended to align with the Victorian amended Definition and align with clause 2.2.3 which considers the Distributor may receive a CoR. Nevertheless, AGL also notes that the definition (including this proposed amendment) is not aligned across the jurisdictions and suggests that this is an opportune time to align the definition.	Red strikeout means delete and <u>blue underline</u> means insert A <i>read</i> undertaken by a <i>Customer</i> of a <i>Retailer</i> details of which are provided by the Customer by telephone or in writing to the Retailer to which the meter relates, or the Distributor for the distribution area in which the distribution supply point to which the meter relates is located	AEMO notes AGL's comment. Please see the response given in ref #28.



1.1.1 Definitions	37.	AGN	Align Customer-own read definition to that of other RMPs – the Distributors in Qld also receive customer-own reads directly from customers.	A <i>read</i> undertaken by a <i>Customer</i> of a <i>Retailer</i> details of which are provided by the <i>Customer</i> by telephone or in writing to the <i>Retailer</i> , <u>or in writing to the <i>Distributor</i></u> to which the <i>meter</i> relates	AEMO supports AGN’s suggestion and will amend the QLD RMP accordingly
1.1.1 Definitions vs 2.2.3 Provision of Meter Reading Information (a)(viii)	38.	Red/Lumo	If a Customer-own read is defined as provided by a Customer to a Retailer (only), how can a customer owned read be provided to a Distributor e.g. Qld RMP 2.2.3 (a)(viii)? (The NSWACT and SA RMP refer to “...User or Network Operator for the delivery point to which the meter relates.” while the Vic RMP refers to “...Retailer or in writing to the Distributor for the distribution area...”)	Customer-own read A read undertaken by a <i>Customer</i> of a <i>Retailer</i> details of which are provided by the <i>Customer</i> by telephone or in writing to the <i>Retailer</i> <u>or in writing to the <i>Distributor</i> for the distribution area</u> to which the <i>meter</i> relates. vs 2.2.3 Provision of Meter Reading Information (a)(viii) where details of a <i>Customer-own read</i> are provided by the <i>Customer</i> in writing to the <i>Distributor</i> , the <i>Distributor</i> must use its reasonable endeavours to provide those details to the <i>FRO</i> by 5.00 pm on the first business day following the day on which the <i>Distributor</i> received those details and must identify the details as relating to a <i>Customer-own read</i> ; and	AEMO notes Red/Lumo’s comment. Please see the response given in ref #37.
2.2.3(v)	39.	AGL	Assuming the definition of CoR includes both customer and FRO (per the above comment), then this clause can be reduced to reflect the receipt of a Customer Own Read by the Distributor	where the <i>Distributor</i> has been provided a <i>Customer-own read</i> by the <i>FRO</i> and the <i>Distributor</i> reasonably considers the <i>Customer-own read</i> to be accurate, the <i>Distributor</i> must use its reasonable endeavours to provide the <i>FRO</i> with the following information:	AEMO notes AGL’s comment. Please see the AEMO response given in ref #28
2.2.3 Provision of Meter Reading Information Clause (v)	40.	Red/Lumo	Red and Lumo disagree with the proposed change as the FRO is only required to provide the customer-own read in the case that the distributor has failed to read the meter. In this circumstance the customer is entitled to prompt communication and validation of the read they have provided to ensure accurate billing, not ‘at a time and frequency agreed by the parties’	(v) where the <i>Distributor</i> has been provided a <i>Customer-own read</i> by the <i>FRO</i> and the <i>Distributor</i> reasonably considers the <i>Customer-own read</i> to be accurate, the <i>Distributor</i> must use its reasonable endeavours to provide the <i>FRO</i> with the following information: (A) the day on which the meter was read; and (B) the validated meter reading for that meter, by 5.00 pm on the first business day following the day on which the <i>Customer-own read</i> was received by	AEMO notes Red/Lumo’s comment. Please see the response given in ref #6.



				the Distributor, or at a time and frequency agreed by the parties	
2.2.3 Provision of Meter Reading Information Clause (viii)	41.	Red/Lumo	Red and Lumo disagree with the proposed change. A customer has the right to expect that the read they provide is processed in accordance with the guidance published by their retailer or network operator and is accepted or rejected in a timely manner, not 'at a time and frequency agreed by the parties.'	(viii) where details of a Customer-own read are provided by the Customer in writing to the Distributor, the Distributor must use its reasonable endeavours to provide those details to the FRO by 5.00 pm on the first business day following the day on which the Distributor received those details or at a time and frequency agreed by the parties and must identify the details as relating to a Customer-own read; and	AEMO notes Red/Lumo's comment. Please see the response given in ref #6.
2.2.4 Customer provided Meter Readings	42.	Red/Lumo	Red and Lumo disagree with the proposed change as the FRO is only required to provide the customer-own read in the case that the distributor has failed to read the meter. In this circumstance the customer is entitled to prompt communication and validation of the read they have provided to ensure accurate billing, not 'at a time and frequency agreed by the parties'.	If, following the failure by a Distributor to read a meter, the Customer of a User provides the User with details of a Customer-own read, the User must use its reasonable endeavours to provide those details to the Distributor by 5.00 pm on the first business day following the day on which it receives those details from the Customer or at a time and frequency agreed by the parties.	AEMO notes Red/Lumo's comment. Please see the response given in ref #6.

Retail Market Procedures (SA)					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
Definition	43.	AGL	AGL considers this definition correct, but notes that it is not aligned across the jurisdictions and suggests that this is an opportune time to align the definition.		AEMO notes AGL's comment. Please see the response given in ref #1 and #28.
Meter Reads	44.	AGL	Other than clause 3.1.4 which relates to a CoR post a network failed meter read, there is no consideration of a customer own read being provided for any other purpose. As there are ongoing technological advances to collect customer meter data, AGL suggests that it would be worthwhile to provide for Customer Own reads within the SA procedures, as some retailers do collect CoR data and the network may in time seek to collect CoR data for cyclic and other reads. Such as check reads or move out / move in reads.		AEMO notes AGL's comment. Please see the response given in ref #28
3.1.4. Customer-own reads	45.	Red/Lumo	Red and Lumo disagree with the proposed change. A customer has the right to expect that the read they	If, following the failure by a Network Operator to read a meter, or for any other	AEMO notes Red/Lumo's comment. Please refer to the response in ref #6.



			provide is processed in accordance with the guidance published by their retailer or network operator and is accepted or rejected in a timely manner, not 'at a time and frequency agreed by the parties.'	reason consistent with applicable laws, the Customer of a Retailer provides a Customer-own read: (a) to its Retailer, the Retailer must use its reasonable endeavours to provide the Customer-own read to the Network Operator by 5.00 pm on the next business day after the day on which it was received from the Customer or at a time and frequency agreed by the parties. (b) to the Network Operator, the Network Operator must process the Customer-own read in accordance with clauses 3.4 to 3.7.	
3.5.2 Actual meter readings	46.	Red/Lumo	The clause presented in the PPC appears to have been incorrectly amended, appending clause (b) to clause (a) and creating a new clause (b) with no statement. As presented: A Network Operator must use an actual meter reading to calculate consumed energy if: (a) the Network Operator has obtained an actual meter reading for the delivery point since the previous meter reading of the delivery point; and (b) the Network Operator is able to validate the actual meter reading; and (c) the Network Operator does not otherwise reasonably suspect an error in the actual meter reading, the heating value or other associated data.	A Network Operator must use an actual meter reading to calculate consumed energy if: (a) the Network Operator has obtained an <i>actual meter reading</i> for the delivery point since the previous <i>meter reading of the delivery point</i> ; and (b) the <i>Network Operator</i> is able to <i>validate</i> the <i>actual meter reading</i> ; and (c) the <i>Network Operator</i> does not otherwise reasonably suspect an error in the <i>actual meter reading</i> , the <i>heating value</i> or other associated data	AEMO notes Red/Lumo's comment. The manner in which the italicisation has been track-changed has been amended. The new clause (b) is an artefact of the document template and will not appear in the clean version once published.

Retail Market Procedures (NSW/ACT)					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
Definition	47.	AGL	AGL notes the core definition of Customer Own Read (CoR) is not aligned to the definition of other jurisdictions (noting the addition for CoR(Actual)).		AEMO notes AGL's comment. Please refer to the response given in ref #28.



			AGL suggest that this is an opportune time to align the CoR definition.		
1.2.2 Interpretation Examples 4 & 5	48.	Red/Lumo	The NSWACT RMP does not consider index reading as a defined term but usage in clause 1.2.2 Interpretation Examples 4 & 5 suggest that it is defined.	Example 4 Hot Water Energy Calculation (except Wagga Wagga/Tamworth Meter index difference = difference between current and previous index reading index reading Example 5 Hot Water Energy Calculation Wagga Wagga/Tamworth Meter index difference = difference between current and previous index reading index reading	AEMO notes Red/Lumo's comment. AEMO supports Red/Lumo suggestion and will amend the NSW/ACT RMP accordingly
1.2.1 Definitions	49.	Red/Lumo	The NSWACT RMP define <i>Read</i> as the defined term but <i>read</i> is used throughout the procedures, not <i>Read</i>	Read read The process of collecting figures or other information from a meter either directly or through being transmitted or transformed by electronic, radio, microwave, sonic or other means.	AEMO notes Red/Lumo's comment. If a word is defined in the RMP, the same definition applies regardless of its capitalisation. AEMO will not be making this change.
3.1.3 Customer provided Meter Readings	50.	Red/Lumo	Red and Lumo disagree with the proposed change as the FRO is only required to provide the customer-own read in the case that the distributor has failed to read the meter. In this circumstance the customer is entitled to prompt communication and validation of the read they have provided, not 'at a time and frequency agreed by the parties'. A customer has the right to expect that the read they provide is processed in accordance with the guidance published by their retailer or network operator and is accepted or rejected in a timely manner.	If, following the failure by a Network Operator to read a meter, the Customer of a Retailer provides a Customer-own read: (a) to its Retailer, the Retailer must use its reasonable endeavours to provide the Customer-own read to the Network Operator by 5.00 pm on the next business day after the day on which it was received from the Customer, or at a time and frequency agreed by the parties. (b) to the Network Operator, the Network Operator must process the Customer-own read in accordance with clauses 3.5 and 3.6.	AEMO notes Red/Lumo's comment. Please see the response given in ref #6.

Register of Weather Related Information					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text Red-strikeout means delete and	AEMO Response (AEMO only)



				blue underline means insert	
Table 2	51.	AGL	Amend table heading from "Service Provider" to 'Source of Data'. The critical issue is the accuracy of data and the party who generated the data, not the party providing it to AEMO.	Service Provider Source of data	AEMO notes AGL's comment. Please see the response given in ref #17.
Table 2 Weather Observation Stations Column label 'Service Provider'	52.	Red/Lumo	Red and Lumo consider that the third-party service provider should be listed, as denoted by the column title, The current content of the table does not match the column title. The Australian Government Bureau of Meteorology may be the data source, but if they are not currently providing the service then the third party should be named here or the column title should be amended.	Table 2 Weather Observation Stations Column label 'Service Provider' 'Data source'	AEMO notes Red/Lumo's comment. Please see the response given in ref #17.