

# July 2023 Retail Electricity Market Procedures Consultation

## FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Origin Energy

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## 1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft version of the *July 2023 REMP Consultation*.

## 2. Feedback on Net System Load Profile Methodology (ICF\_072) discussion

Question	Participant Comments
<p>1. Do you agree that Option 1 best achieves the desired objectives and principles? If not, why?</p>	<p>Origin Energy agrees that Option 1 achieves the desired objectives.</p>
<p>2. Do you believe an alternative methodology would better achieve the desired objectives and principles? Why? Please provide details of the alternative methodology.</p> <ul style="list-style-type: none"> <li>The selection of an alternative methodology would likely result in a delay to the longer-term methodology being implemented, as AEMO would need to develop, analyse and test this alternative.</li> </ul>	<p>Origin Energy does not have any alternative methodology to propose.</p>
<p>3. Do you agree that the preferred methodology should not be implemented prior to October 2024 and that with the implementation of the new methodology</p>	<p>Origin Energy agrees that the preferred methodology (being Option 1 from our perspective) should be implemented from Oct 2024 onwards, and also</p>

Question	Participant Comments
<p>should occur during a historically less volatile pricing period? If not, why?</p>	<p>agrees with the caveat around volatile pricing period, the lesser the better (based on historical data).</p>

### 3. Feedback on Substitution Type review (ICF\_054) discussion

Question	Participant Comments
<p>1. Do you agree that the proposed changes, to the substitution types and reason codes, will achieve the desired objective? In not, why?</p>	<p>Origin broadly agrees with the new substitution types and reason codes. However for type 16 substitution proposed to be made obsolete, it takes away the timeframes that were required to ‘final substituted sites’ within the 7 days for COMMS 1, 2 and 3 meter types, and 14 days for COMMS4 meter type.</p> <p>Origin recommends changes to ‘Final Substitution’ rules to mitigate risks of ongoing temporary substitution for long term periods, and to ensure customers have accurate finalised reads within reasonable timeframes as well as a reduction in rebilling frequency due to various revisions.</p> <p>This can be based on ability to extract actual meter reads from the meters and corresponds to the maximum period of 60 days for an MP to fix Meter Faults/Issues.</p> <p>As such, Origin recommends:</p> <p><b><u>For COMMS 1, 2 ,3 &amp; 4 Meters</u></b> : Finalise sub meter reads by 3 months/90 days, where the faulty/replaced meter has passed its storage capacity and</p>

Question	Participant Comments
	<p>unable to extract actual reads from the meter. This includes below scenarios.</p> <ul style="list-style-type: none"> <li>• Finalise sub meter reads by 3 months/90 days where a meter has been replaced, and all attempts have been made to obtain actual reads from the old meter but have failed.</li> <li>• Finalise sub meter reads by 3 months/90 days where all prior attempts have failed to obtain a replaced meter (lost meter/equipment).</li> <li>• Finalise sub meter reads by 3 months/90 days where all prior attempts have failed to obtain actual reads from the faulty meter.</li> </ul>
<p>2. Which of the proposed implementation dates do you believe should be pursued, and why?</p>	<p>Origin suggests this change to be implemented no earlier than November 2024. This is consistent with the 12-months implementation period as a standard industry practice and will ensure sufficient time is provided to perform detailed impact assessment on our retail processes and/or systems, followed by designing, building, testing and implementing the new changes.</p>

#### 4. Feedback on Summation Metering Changes (ICF\_073) discussion

Question	Participant Comments
<p>1. Do you agree with the proposed inclusion of the three summation arrangements? If not, why?</p>	<p>No comments</p>

Question	Participant Comments
2. Do you believe that an alternative approach would better achieve the desired objective?	No comments
3. Is the summation method detailed enough or should it be more prescriptive?	No comments
4. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.	No comments

## 5. Feedback on NMI Discovery for MCs discussion

Question	Participant Comments
1. Do you agree with the proposed change to the CATS Procedure? If not, why?	<p>Origin acknowledges the conflict that exists between NER and CATS Procedures and have no comments related to the proposed changes in CATS Procedure. Having said that, Origin understands that providing access to NMI Standing Data to prospective MCs have numerous merits including managing crossed meter investigations to find out who the current FRMP/MC/MDP is for the other NMI, and most commonly in the multi-occ situations where all the meters have to be replaced and NMI discovery is used to confirm the retailers for each NMI.</p> <p>Origin believes that removing the ability for prospective MCs to use NMI discovery will be detrimental to our end customers. If Origin is the current retailer for one of the sites within a multi-occ site, Origin relies on its contracted MCs to inform where there is a shared fuse, and meter</p>

Question	Participant Comments
	<p>exchange is taking place for another site where Origin is not the current retailer. With the help of NMI Discovery, our MCs can check the FRMP on the site and provide all the information however failure to obtain this information, MCs would be required to contact (door knock?) the end customer to confirm their current retailer which would create friction in the process because customer may not be willing to engage with a third party knocking on their door, who they do not know and deal with. Similarly in crossed meters situations (most of which are ombudsman cases), the customer will need to get information from the neighbour, who they may not have a relationship with. Moreover, information provided by the customer will not be able to be verified, which will result in errors (wrong NMI's involved) and in many cases further delays.</p>
<p>2. Do you believe that an alternative approach would better achieve the desired objective?</p>	<p>An alternative approach is for AEMO to raise a rule change request to the AEMC, and if it receives unanimous support, this could follow an expedited pathway keeping in mind there are no system changes required by any participant.</p> <p>This will also ensure AEMO honours the previously held consultation outcome for ICF005 that was performed under the Rules, and underwent AEMO's legal assessment at that time.</p> <p>To minimise immediate customer detriment, which has a direct impact on Origin's as a retailer, and if AEMO believes that the outcome of ICF005 is in direct conflict with NER 7.15.5, it should seek a 'letter of no objection' from the regulator in providing NMI Discovery function to prospective MCs, while proceeding with the expedited rule change request. Additionally, AEMO should implement safeguards in MSATS to ensure this functionality is not being inappropriately used by the MCs, including any monitoring,</p>

Question	Participant Comments
	reporting and auditing MC's processes that can be undertaken by AEMO as per the NER.
3. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.	Origin agrees that this issue need to be fixed on an as-soon-as possible basis.