

July 2023 Retail Electricity Market Procedures Consultation

Consultation paper -
Standard consultation for the
National Electricity Market

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New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

Australian Energy Market Operator Ltd ABN 94 072 010 327

Explanatory statement and consultation notice

This Consultation Paper commences the first stage of the standard rules consultation procedure conducted by AEMO (**Consultation**) to consider the changes (**Changes**) which are proposed (**Proposal**) to the Retail Electricity Market Procedures (**REMP**) under the National Electricity Rules (**NER**), which relate to the following three Issues and Change Forms (**ICFs**) raised by the Electricity Retail Consultative Forum (**ERCF**), as well as an additional amendment raised by AEMO:

- ICF_072 - New Net System Load Profile (**NSLP**) Longer-term Methodology
- ICF_054 - Substitution Types review
- ICF_073 - Summation Metering Changes
- Amendments to the NMI Discovery access for Metering Coordinators (**MCs**)

AEMO has prepared this Consultation Paper to initiate discussion and facilitate feedback from stakeholders regarding the Proposal.

The detailed sections of this Consultation Paper include more information on the Proposal and AEMO's reasons for making the Proposal.

AEMO invites stakeholders to suggest alternative options where they do not agree that the Changes would achieve the relevant objectives.

AEMO also asks stakeholders to identify any unintended adverse consequences of the Changes.

Consultation notice

AEMO invites written submissions from interested persons on the issues identified in this Consultation Paper to NEM.Retailprocedureconsultations@aemo.com.au by 5:00pm (Melbourne time) on 24 August 2023.

All submissions must be forwarded in electronic format (both pdf and Word). Please send any queries about this Consultation to the same email address.

Submissions may make alternative or additional proposals you consider may better meet the objectives of this consultation and the national electricity objective in section 7 of the National Electricity Law (**NEL**). Please include supporting reasons.

Before making a submission, please read and take note of AEMO's consultation submission guidelines, which can be found at <https://aemo.com.au/consultations>. Subject to those guidelines, submissions will be published on AEMO's website.

Please identify any parts of your submission that you wish to remain confidential and explain why. AEMO may still publish that information if it does not consider it to be confidential but will consult with you before doing so. Material identified as confidential may be given less weight in the decision-making process than material that is published.

Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Interested persons can request a meeting with AEMO to discuss any particularly complex, sensitive or confidential matters relating to the Proposal. Please refer to NER 8.9.1(k). Meeting requests must be received by the end of the submission period and include reasons for the request. We will try to

accommodate reasonable meeting requests but, where appropriate, we may hold joint meetings with other stakeholders or convene a meeting with a broader industry group. Subject to confidentiality restrictions, AEMO will publish a summary of matters discussed at stakeholder meetings.

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1. Stakeholder consultation process

As required by the National Electricity Rules (**NER**), AEMO is consulting on changes to the Retail Electricity Market Procedures (**REMP**) (**proposal**) in accordance with the standard rules consultation procedure in NER 8.9.2.

This Consultation Paper uses terms defined in the NER, which are intended to have the same meanings. A glossary of additional terms and abbreviations is in Appendix A.

AEMO’s indicative process and timeline for the Consultation are outlined below. Future dates may be adjusted, and additional steps may be included, if necessary during the course of the Consultation.

Consultation steps	Dates
Net System Load Profile Sub-group discussion	7 March 2023
Substitution Type Review Sub-group discussion	19 May 2023 – 29 June 2023
Consultation Paper published	26 July 2023
Submissions due on Consultation Paper	24 August 2023
Draft Report published	5 October 2023
Submissions due on Draft Report	3 November 2023
Final Report published	15 December 2023

2. Background

2.1. Context for this consultation

This consultation is seeking stakeholder feedback regarding the following:

- ICF_072 – A preferred NSLP Longer-term Methodology
- ICF_054 – Changes to the existing Substitution Types and Reason Codes
- ICF_073 - Summation Metering Changes
- Amendments to NMI Discovery access for Metering Coordinators (**MC**)

2.1.1. ICF_072 - Preferred NSLP Longer-term Methodology

AEMO’s Meter Data Management (**MDM**) system generates the following load profiles, to support market settlement processes:

- The Five-Minute Load Profiles (**5MLP**) create a profile shape which is used to convert 30-minute and 15-minute interval metering data into 5-minute trading intervals.
- The Net System Load Profiles (**NSLP**) create a profile shape which is used to convert accumulation (basic meter) reads, that typically account for consumption over a 90-day period, into 5-minute trading intervals.

In recent years, NSLP volumes have substantially reduced, predominantly due to the rollout of mass interval metering across certain parts of the NEM e.g. Victoria.

When positive and negative NSLP trading interval values are present, significant fluctuations, or ‘spikes’, are observed when the NSLP is applied to accumulation metering data. These spikes are a consequence of having a small denominator value in the profiling algorithm.

The profiled energy would correctly sum to the original metering data. However, the profiled values may not be representative. Where these 'spikes' coincide with high spot/pool prices, unintended consequences may occur including trading limit breaches.

The Load Profiling Methodology Consultation, conducted in 2022, sought to address these spike-related issues. However, the longer-term solution supporting NSLPs was ultimately decoupled from the consultation. This decoupling was to allow additional time to complete sufficient analysis, to more comprehensively understand the potential impacts associated to applying alternative methodologies.

2.1.2. ICF_054 – Substitution Types review

Currently, the substitution types which are associated with small market interval metering are limited. Accordingly, in recent years, substitution approvals have risen dramatically from affected Financially Responsible Market Participants (**FRMP**), Embedded Network Local Retailers (**ENLR**), where appropriate, and Local Network Service Providers (**LNSP**).

These approvals are required where the Metering Data Provider (**MDP**) intends to apply the Type 16 Agreed Method. The associated approval processes:

- results in a substantial amount of administrative effort for all parties;
- may result in delays in the provision of metering data; and
- may result in compliance issues for the MDPs.

Additionally, due to the application of the Type 16 Agreed Method, the underlying cause of the substitution is not easily communicable. That is, the recipient will not be able to distinguish between a situation where the substitution is being provided due to crossed meters, as opposed to failed phase on 3 phase supply, for example.

The Proposal aims to identify and implement the Changes to the substitution type methods, and associated reason codes, to ensure that recipients of that data have a clearer understanding of the exact reason and method used to support the provided value. This, in turn, will substantially reduce the need for agreements amongst the relevant parties.

2.1.3. ICF_073 – Summation Metering Changes

As part of Power of Choice Rule changes in 2017, summation metering was grandfathered, as the transitional arrangements were removed from chapter 9 of the NER.

Since 2017, there have been situations where summation metering could have been leveraged to minimise market settlement impacts, for example, under rare HV breaker scenarios.

The Proposal is to update clause 5 of Metrology Part A to clarify the changes which:

- are acceptable to support legacy summation metering arrangements; and
- will be acceptable in future to support new metering installation summation arrangements.

2.1.4. Amendments to the NMI Discovery access for Metering Coordinators (MC)

NER 7.15.5 explicitly restricts access to NMI Standing Data for MCs, MPs and MDPs. 7.15.5(c) specifically, only allows for access to NMI Standing Data for NMIs where the MC is currently, or was previously, appointed. AEMO had previously determined to enable access to NMI Standing Data via the MSATS NMI Discovery search facility, despite the NER restriction (via consultation in relation to ICF_005). AEMO proposes to realign the CATS Procedures with the NER.

AEMO is seeking stakeholder feedback on each of the proposed changes presented as a part of this consultation.

2.2. NER requirements

AEMO is responsible for the establishment and maintenance of retail electricity market procedures specified in NER Chapter 7, except for procedures established and maintained under NER 7.17.

The procedures authorised by AEMO under NER Chapter 7 must be established and maintained by AEMO in accordance with the NER consultation procedures.

2.3. The national electricity objective

Within the specific requirements of the NER applicable to this proposal, AEMO will seek to make a determination that is consistent with the national electricity objective (**NEO**) and, where considering options, to select the one best aligned with the NEO.

The NEO is expressed in section 7 of the NEL as:

to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers of electricity with respect to:

- (a) price, quality, safety, reliability and security of supply of electricity; and
- (b) the reliability, safety and security of the national electricity system.

3. Net System Load Profile Methodology (ICF_072) discussion

Through engagement with industry participants at the ERCF, the following objectives were established to assist in assessing potential longer-term methodologies:

- Standard and consistent application of the methodology across the NEM
- Balancing simplicity with the quality of the outcome
- Minimising energy volume spikes in profiled reads
- Ensuring gradients of profiled 5-minute reads match the gradients of the NSLP

The analysis AEMO can perform with respect to understanding the potential consequential impacts to Unaccounted for Energy (**UFE**) allocations is limited due to:

- The unavailability of the latest data in AEMO’s lower testing environments
- The need for 365 days of data to scrutinise NSLP outcomes
- The impact of the removal of the weights (in some profile areas) and the change in 5MLP methodology to the NSLP outcomes
- The impact of the timing of methodology implementation on the profiling or allocation of the reads among the methodologies
- The different trends and behaviours in respect of the several profile areas – the impact to UFE and the impact to NSLP may differ in different profile areas depending on the volume of five-minute meters

Based on the proposed objectives and available analysis, AEMO has identified the three potential methodologies:

Table 1 NSLP Methodologies

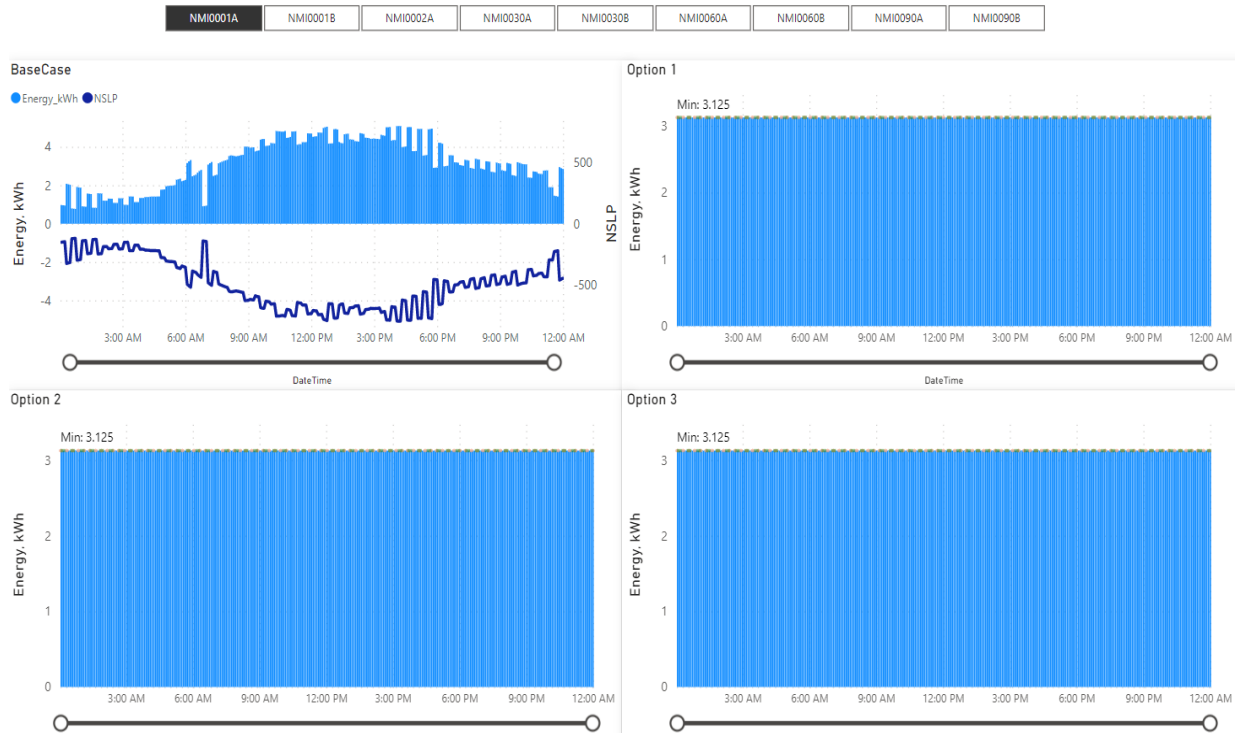
Methodology	AEMO Comments
<p>Option 1 – For NSLP values less than a minimum value, set the NSLP value to a minimum (non-zero) value (“Floor”)</p>	<ul style="list-style-type: none"> • Only impacts the reads to be profiled that traverse the low value period • Impact on an individual read varies depending on where it overlaps the profiling period • Simple process and easy to implement and understand • Quasi-UAM approach (where the calculated NSLP is below the threshold value, the application of the revised profile results in the same energy value being calculated and applied for the 5-minute periods)

Methodology	AEMO Comments
<p>Option 2 – For NSLP values less than a minimum value, set the NSLP to be the average of the positive NSLP values for the trading day</p> <ul style="list-style-type: none"> If all NSLP values for a day < minimum value, set NSLP = minimum (non-zero) value 	<ul style="list-style-type: none"> Only impacts the reads to be profiled that traverse the low value period Impact on individual read varies depending on where it overlaps the profiling period Complexity of methodology and system implementation Potentially results in a strange energy profile which is inconsistent with expected consumption profile
<p>Option 3 – For NSLP values less than a minimum value, set the NSLP to the minimum of the positive NSLP values for that trading day</p> <ul style="list-style-type: none"> If all NSLP values for a day < minimum value, set NSLP = minimum (non-zero) value 	<ul style="list-style-type: none"> Only impacts the reads to be profiled that traverse the low value period Impact on individual read varies depending on where it overlaps the profiling period Complexity of methodology and system implementation Potentially results in a strange energy profile which is inconsistent with expected consumption profile

3.1. Assessment of Options

If the NSLP values corresponding to the read period are negative for all intervals, all three options would have the same profiling outcome (**UAM**) as demonstrated in Figure 1.

Figure 1 Negative NSLP values for all intervals in read period



If the NSLP values corresponding to the read period are positive for all intervals, all three options would have the same profiling outcome as the current methodology (no change) as demonstrated in Figure 2.

Figure 2 Positive NSLP values for all intervals in read period

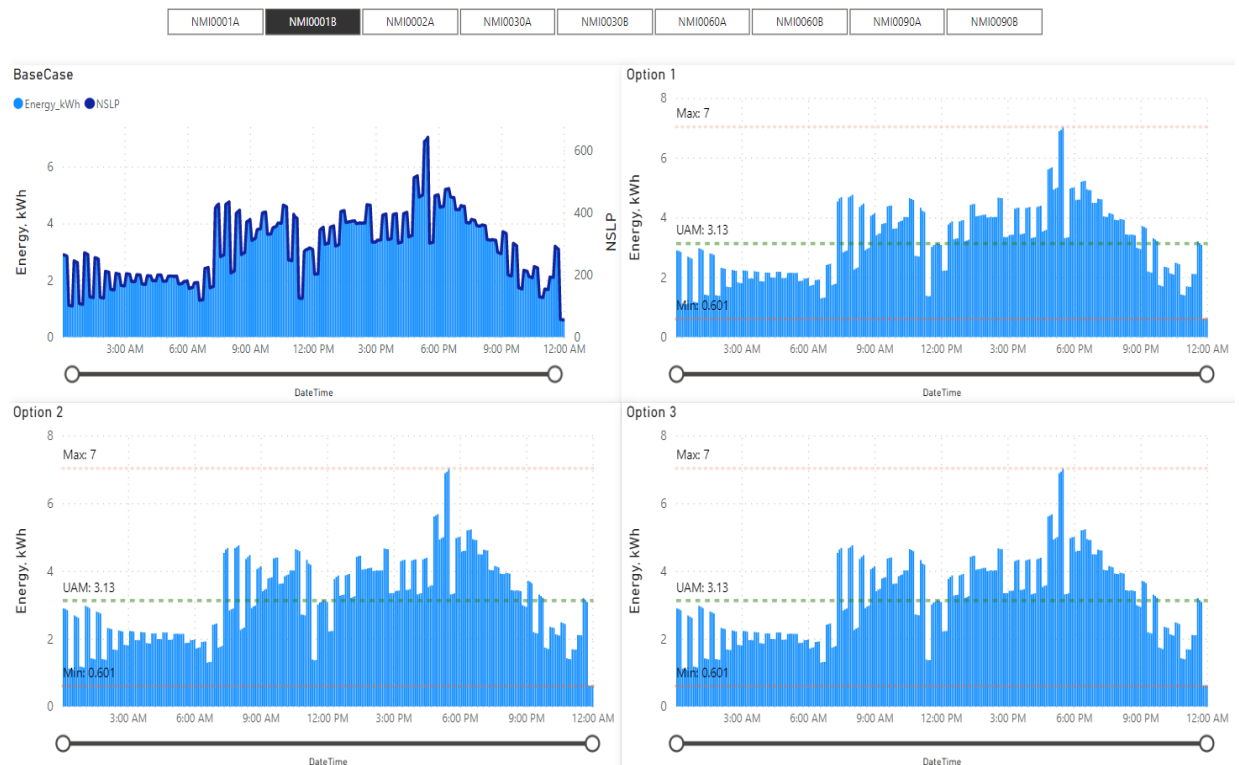


Figure 3 demonstrates how the current methodology can result in energy volume spikes. In this regard the three alternative options minimise the likelihood and occurrence of spikes (a single interval's profiled energy volume would not exceed the energy value for the read period).

Figure 3 Energy volume spikes in profiled reads

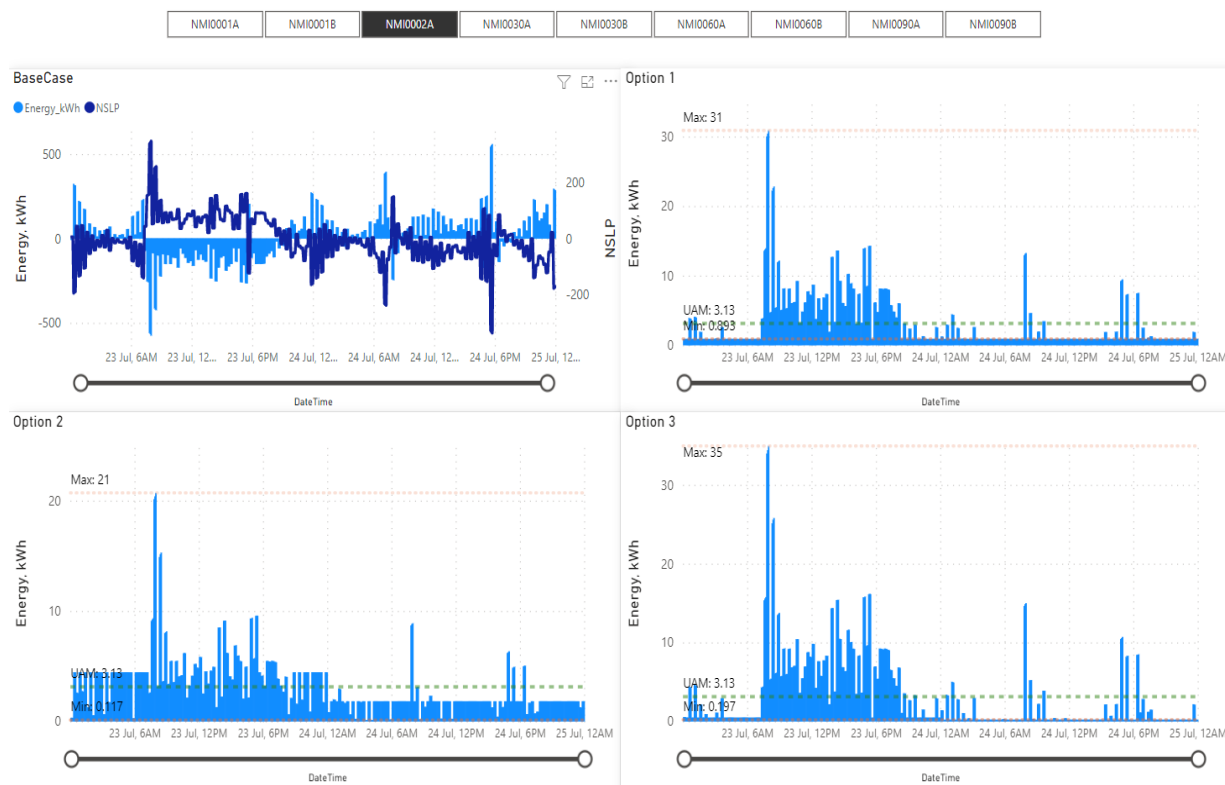


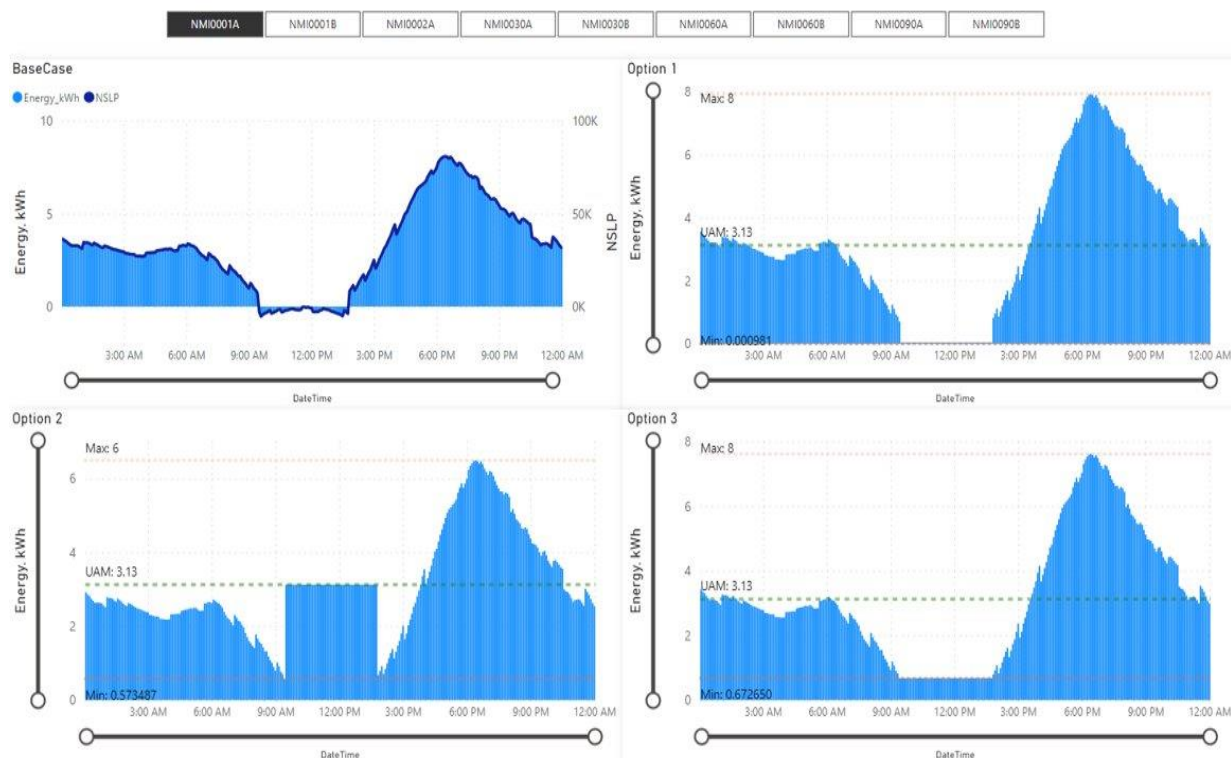
Figure 4 demonstrates a single day read with negative periods in the middle of the day:

- Option 1 reflects very low profiled values for the middle of the day, which is consistent with the NSLP.
- Option 2 and Option 3 show that due to the resulting average and minimum value of the non-negative NSLP values, respectively, instead of a dip in the middle of the day occurring, a step change is observed.

These outcomes indicate that the inclusion of a dynamic consideration, such as an average or minimum, may result in outcomes that are not consistent with a NSLP's behaviour.

Therefore, areas where NSLP volumes are much higher have the potential for significant distortions when applying Option 2 or Option 3.

Figure 4 A single day read with negative NSLP values in the middle of the day



3.2. How the proposal meets the objectives

AEMO believes that Option 1 best achieves the proposed objectives, on the basis that Option 1:

- Supports a standard and consistent application across the NEM.
- Is simpler to communicate/understand compared to Options 2 and 3.
- Is easier to implement compared to Options 2 and 3.
- Best minimises energy volume spikes in profiled reads.
- Does not result in unusual energy profiled values.
- Results in the gradients of the profiled 5-minute reads most closely aligned to the gradients of the NSLP.

3.3. Proposed effective date

An implementation date of no earlier than 1 October 2024 is proposed, given:

- The time required to complete this Consultation under NER 8.9.
- The requirements of the subsequent system build, testing and release activities.
- The ability to assess the impact of the new longer-term 5MLP methodology from 1 October 2023.
- The preference to implement the new methodology during a historically less volatile pricing period.

Questions

1. Do you agree that Option 1 best achieves the desired objectives and principles? If not, why?
2. Do you believe an alternative methodology would better achieve the desired objectives and principles? Why? Please provide details of the alternative methodology.
 - 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.
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 should occur during a historically less volatile pricing period? If not, why?

4. Substitution Type review (ICF_054) discussion

The ERCF agreed that the current substitution rules supporting Type 1-4 interval metering needed to be reviewed, given the increasing Type 4 Small saturation in the interval meter market.

In particular:

- When compared to Type 4 substitution rules, Type 4A and Type 6 substitution rules allow for greater flexibility and encompass more scenarios in the cases where data may be missing, or the data requires finalisation.
- Where no existing Type 1-4 substitution rule is applicable, a MDP must seek approval from affected participants to use an agreed or alternate methodology through a Type 16 and Type 18 substitution, resulting in an administrative burden on all parties.

Further:

- Given the volume of smart meters installed since Power of Choice (**POC**), the use of Type 18 substitutions has increased, particularly as Planned Interruption Notifications (**PIN**) are required and/or Meter Providers (**MPBs**) are unable to access premises to rectify communications faults in a timely manner.
- When a standard substitution rule can be applied, the period of data requiring substitution may exceed 7 days for Type 1-3 meters and 15 days for all other meters, requiring approval from affected participants to apply a Type 16 substitution method.

These restrictions make it difficult for MDPs to automate the substitution and provision of metering data in a timely manner.

Whilst bilateral agreements are permitted between MDPs and affected participants to approve the use of Type 16 and Type 18 substitutions effectively automatically, not all participants allow this approach. Accordingly, MDPs communicate via email to wait for approvals before committing a substitution, delaying billing for customers and potentially the settlements process. Settlements are also impacted by the inaccuracy of substituted data, where better source data could be used in line with Type 6 metering substitution rules.

An ERCF sub-group was formed to identify and recommend changes to the existing substitution rules and processes, to:

- Equip MDPs with a greater range of substitution methodologies which will cover most scenarios.
- Remove unnecessary administration for all affected participants.
- Allow for greater automation of systems, providing better clarity to recipients of substituted metering data.

4.1. Description and effect of proposal

The Proposal is to amend the Metrology Procedure Part B procedure to including the following new substitution types:

Substitution Type	Methodology	Possible Use Cases	Changes/Comments
Type 14 - Retrospective Like Day	To perform a type 14 Substitution, the MDP must Substitute missing or erroneous <i>metering data</i> using the nearest equivalent day or like day method, as detailed in Table 1.	Metering data could not be retrieved or where metering data is erroneous	Name change only from <i>Like Day</i> to <u><i>Retrospective Like Day</i></u>
Type 15 - Retrospective Average Like Day	To perform a type 15 Substitution, the MDP may Substitute for the missing or erroneous <i>metering data</i> using the average like day method, as detailed in Table 2.	Metering data could not be retrieved or where metering data is erroneous but the previous week prior to the affected period is higher or lower than normal	Name change only from <i>Average Like Day</i> to <u><i>Retrospective Average Like Day</i></u>
Type 16 - Agreed Method	To be made obsolete.	To be made obsolete	To be made obsolete with the intention that: <ul style="list-style-type: none"> Type 16 may still be used for historical purposes Type 18 would be used as an alternative
Type 20 - Prospective Like Day	To perform a type 20 Substitution, the MDP must Substitute missing or erroneous metering data using the nearest equivalent day or like day method, as detailed in Table 3: <ol style="list-style-type: none"> Where the MDP applies a type 19 Substitution following a Meter Churn and the previous MDP has not provided metering data for the start of the Meter Churn Day: or 	New MDP has not received churn data or churn data is not available from the old MDP New meter installed but no metering data could be retrieved or was erroneous from installation date and where no previous data is available or cannot be used	Name change only from <i>Previously Churn Correction</i> to <u><i>Prospective Like Day</i></u> to allow for other scenarios instead of just meter churn

Substitution Type	Methodology	Possible Use Cases	Changes/Comments
	<ul style="list-style-type: none"> b) Where no historical data is available or applicable 		
<p>Type 22 - Prospective Average Like Day</p>	<p>To perform a type 22 Substitution, the MDP may Substitute for the missing or erroneous metering data using the average like day method, as detailed in Table 4:</p> <ul style="list-style-type: none"> a) Where the MDP applies a type 19 Substitution following a Meter Churn and the previous MDP has not provided metering data for the start of the Meter Churn Day: or b) Where no historical data is available or applicable 	<p>New MDP has not received churn data or churn data is not available from the old MDP</p> <p>New meter installed but no metering data could be retrieved or was erroneous from installation date and where no previous data is available or cannot be used</p>	<p>New rule</p>
<p>Type 23 - Previous Year</p>	<p>To perform a type 23 Substitution, the MDP must provide a Substitute using the metering data from the nearest equivalent day or like day from the same, or similar, Meter Reading period in the previous year. The nearest equivalent day or like day is to be determined from Table 3.</p>	<p>Missing or affected data on a connection point where load is seasonal (e.g. increased energy consumption in summer in warmer climates extreme heat or in areas where heating is used in winter; factories; agricultural sites for water pumps)</p>	<p>New rule</p>

Substitution Type	Methodology	Possible Use Cases	Changes/Comments
Type 24 – Data Scaling	To perform a type 24 Substitution, the MDP must apply a multiplier value to scale any affected erroneous Actual meter reading data either up or down to reflect missing or over-estimated registration	Where incorrect CT or VT ratios are identified on site; VT failure or meter phase failure occurs resulting in loss of registration to 1 or 2 phases; the meter is programmed with the incorrect multiplier; or the incorrect head end system meter multiplier applied	New rule
Type 25 - Average Daily Load (ADL)	Where no other option is available, the substituted period is calculated based on Average Daily Load which may or may not be profiled.	Where no previous interval meter data history is available, but an ADL can be provided from Retailer based on consumption/generation on Type 6 meter. Stacking may be applicable for import channel or export-controlled load	New rule

Four new reason codes are also being proposed, to:

- Increase the effectiveness of the proposed substitution type changes.
- Better communicate to recipients why the substitution was carried out, reducing the need for MDPs to email or raise Verify Meter Data (**VMD**) requests to seek further information.

These codes are:

- Incorrect Meter Multiplier
- Device unmetered
- Customer by-pass
- Network by-pass

4.2. Proposed effective date

Due to the current level of change/reform congestion in the market, AEMO is proposing either of the following implementation dates:

- 4 November 2024.
- 5 May 2025.

Questions

1. Do you agree that the proposed changes, to the substitution types and reason codes, will achieve the desired objective? In not, why?
2. Which of the proposed implementation dates do you believe should be pursued, and why?

5. Summation Metering Changes (ICF_073) discussion

As part of POC rule clean up changes in 2017, summation metering was grandfathered as the transitional arrangements were removed from chapter 9 of the NER.

Since the removal of these arrangements, the following three scenarios have been identified where summation metering could be used to minimise market settlement impacts:

- Rare HV breaker-and-a-half scheme scenario.
- Scenarios where it is not possible to meter without summation due to physical restriction.
- Cable sizing required for large currents, where a CT core could not be accommodated.

5.1. Description and effect of proposal

The Proposal is to update clause 5 of Metrology Part A to clarify the support which:

- is acceptable to support legacy summation metering arrangements; and
- will be acceptable in future for new metering installation summation arrangements.

Specifically, the Proposal is to revise clause 5, “Summation Metering”, in the Metrology Procedure Part A to allow the following three types of summation arrangements:

1. HV breaker-and-a-half schemes.
2. HV single transformer fed by multiple parallel cables.
3. Cross boundary supply single transformer with multiple LV Circuits.

5.2. Proposed effective date

As this change results in no system impacts to AEMO or industry participants and to adhere to clause 7.16.3 (b) of the NER, an effective date of 13 May 2024 is being proposed.

Questions

1. Do you agree with the proposed inclusion of the three summation arrangements? If not, why?
2. Do you believe that an alternative approach would better achieve the desired objective?
3. Is the summation method detailed enough or should it be more prescriptive?
4. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.

6. NMI Discovery for MCs discussion

AEMO has proposed in its submissions to the ongoing AEMC Metering Services Regulatory Framework Review (**AEMC Review**)¹ that Metering Coordinators be given more expansive rights to access NMI Standing Data.

Currently:

- NER 7.15.5 restricts access explicitly to MCs, MPs and MDPs.
- NER 7.15.5(c)(2) restricts access to NMI Standing Data to the MC who is appointed currently or who was appointed previously in respect of a NMI.
- Conversely, to facilitate retail competition, NER 7.15.5(e) provides that a retailer may access NMI Standing Data without exception, including in respect of prospective customer NMIs.

However, despite these restrictions, AEMO recently identified the issue that the MSATS Procedures enable prospective MCs to access all NMI Standing Data through the MSATS NMI Discovery search facility.

AEMO identified this issue as AEMO was preparing its submissions to the AEMC Review.²

6.1. Description and effect of proposal

This issue arose in the context of the Industry Change Form, ICF_005, MC (NMI) Standing Data Search, which was posted in 2018 by Acumen Metering (now part of the Intellihub business) (**ICF005**).

ICF_005 requested AEMO to enable prospective MC to access all NMI Standing Data, as follows:

**Industry Change Form
ICF005, MC (NMI) Standing Data Search, 2018
Enable a prospective MC appointed by the customer to conduct NMI standing data search for customer churn purposes**

“Metering Coordinators (MC) are being engaged by retailers to manage market transactions, nominating themselves as the MC for Large customer sites. There are a number of ‘Large’ customers that have tails to ‘Small’ sites that are part of a collective agreement with an MC/MP of their choice. However, the MC is not able to raise a CR 6300 under the rules. MSATS allows for a Change Request transaction to take place, but the rules state that this cannot be performed by the MC. It can only be performed by the FRMP.

The prospective MC has no current visibility of the NMI Classification or other market participants (namely the current MPB/MPC/MDP) for the site or any other MSATS Standing Data until a C7 report is made available (C7 does not return NMI Classification) which is after the raising of the market CR.”

¹ <https://www.aemc.gov.au/market-reviews-advice/review-regulatory-framework-metering-services>

² <https://www.aemc.gov.au/market-reviews-advice/review-regulatory-framework-metering-services>

Subsequently, AEMO progressed this issue as follows:

- AEMO published the Initial Consultation on 26 July 2018.
- AEMO published the Final Determination on 23 November 2018.
- The MSATS Procedures changes commenced on 20 May 2019.³

Currently, however, as noted above, NER 7.15.5(c)(2) restricts access to NMI Standing Data to:

- Current MC – the MC who is appointed in respect of the relevant connection point; or
- Previous MC – the MC who was appointed in respect of the relevant connection point, as required in connection with a Metering Coordinator default event in accordance with procedures authorised under the NER.

Accordingly, an MC is not authorised to undertake a NMI Discovery search for a connection point where it is not, or was not, the MC.

However, the potential exception exists to these limitations, where, in a single calendar day, the following sequential actions occur in MSATS:

- An MC is appointed by a large customer by agreement at the NMI, in accordance with NER 7.6.2(a)(3)(ii).
- The newly appointed MC performs a NMI Discovery search to access the NMI Classification Code, based on the MC's financial interest in the Large Customer NMI or the energy measured by the Large Customer NMI, in accordance with NER 7.15.5(c)(1).
- The newly appointed MC initiates a Change Request 6300 or 6301 to change the MC, by appointing itself as the MC at the Large Customer NMI.

In this regard, AEMO's engagement in the AEMC Review includes AEMO submissions in which AEMO recommended to the AEMC to consider expanding the access rights of MCs, as noted above. AEMO has subsequently provided the AEMC with the information in ICF005.

6.1. Proposed effective date

To resolve the conflict between the NER and the CATS Procedure, AEMO considers the effective date should be as early as possible. That earliest date would coincide with the publication of the final determination, an effective date of 13 December 2023 is therefore being proposed.

Questions

1. Do you agree with the proposed change to the CATS Procedure? If not, why?
2. Do you believe that an alternative approach would better achieve the desired objective?
3. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.

7. Summary of issues for consultation

Submissions may be made on any matter relating to the proposal discussion in this consultation paper. AEMO would welcome comment and feedback on the following matters:

³ <https://aemo.com.au/en/consultations/current-and-closed-consultations/msats-procedures>

1. ICF_072 - New Net System Load Profile (**NSLP**) Longer-term Methodology
 - The proposed new NSLP methodology to negate settlement spikes
2. ICF_054 – Substitution Types review
 - The obsolescence of Type 16 – Agreed Method
 - The addition of seven new substitution types
 - The addition of four new reason codes to support new substitution types
3. ICF_073 - Summation Metering Changes
 - The update to clause 5 of Metrology Part A to support legacy summation metering arrangements
4. Amendments to the CATS Procedure in respect of NMI discovery access for MCs

Appendix A. Glossary

Term or acronym	Meaning
5MLP	Five-Minute Load Profile
CATS	Consumer Administration and Transfer Solution, a part of MSATS.
ENLR	Embedded Network Local Retailer
ERCF	Electricity Retail Consultative Forum
FRMP	Financially Responsible Market Participant
ICF	Issue / Change Form
LNSP	Local Network Service Provider
MDP	Meter Data Provider
MC	Metering Coordinator
MSATS	Market Settlements and Transfer Solution
NEM	National Electricity Market
NEL	National Electricity Law
NER	The National Electricity Rules made under Part 7 of the National Electricity Law
NMI	National Metering Identifier
NSLP	Net System Load Profile
PIN	Planned Interruption Notification
PoC	Proof of Concept
POC	Power of Choice
UAM	Uniform Allocation Method