JULY 2023 REMP CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Red Energy and Lumo Energy*

Submission Date: *3rd November 2023*

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the July 2023 REMP consultation.

The changes being proposed are due to three ICF's raised through the ERCF and an AEMO proposed change, resulting to changes to AEMO's Retail Electricity Market Procedures to implement the recommended process improvements.

2. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
Appendix E. Reason codes	Addition of Incorrect Meter Multiplier	Red Energy & Lumo Energy (Red & Lumo) agree with this addition.
Appendix E. Reason codes	Addition of Temporarily Connection Point unmetered	Red & Lumo agree with this addition.
Appendix E. Reason codes	Addition of Customer By-Pass	Red & Lumo agree with this addition. Further to this Origin Energy notes that customers are unable to bypass their meter. Red & Lumo regularly see instances where a customer has illegally bypassed the meter and this code would be appropriate in those instances.
Appendix E. Reason codes	Addition of Network By-Pass	Red & Lumo agree with this addition. However, given the recent addition of "Network by-pass - Extreme Weather", we suggest the description be updated to reflect this and the Detailed Description stating fault. We suggest the updated description to be "Network By-Pass Meter Fault"

Section	Description	Participant Comments
Appendix E. Reason codes	Addition of Transposed Channel	Red & Lumo agree with this addition.
Appendix E. Reason codes	Addition of Transposed Channel - UoM Correction	Red & Lumo agree with this addition.
Appendix E. Reason codes	Addition of Transposed Channel – Reverse Polarity	Red & Lumo agree with this addition.
Appendix E. Reason codes	Addition of Transposed Meter	Red & Lumo agree with this addition.
Appendix E. Reason codes	Addition of Network by-pass extreme weather	Red & Lumo agree with this addition.
Appendix E. Reason codes	Addition of Defined load method	Red & Lumo agree with this addition.

3. Metrology Part A

Section	Description	Participant Comments
5.2 New Metering Installation Summation Arrangements	Addition of new section	Red & Lumo note the marked draft v751 was incorrectly numbered and was adding a section 5 and renumbering the following sections. Summation metering was already included in the Metrology Part A as section 5. Red & Lumo have no further feedback.
2.3 Summation Method	Addition of new section	Red and Lumo note this response template document to be incorrect as it lists this section as 2.3, when it is in fact 5.3 Summation Method, we do note however the marked draft v751 has been added correctly. Red & Lumo have no further feedback.

4. Metrology Procedure Part B

Section	Description	Participant Comments
2.6 Summary table of Subtition	Edited to include: ● Rewording of type 14, type 15 and type 20 ● Obsoletion of type 16 ● Addition of new substitution types 22,23,24,25.	Red & Lumo agree with these changes.
3.2 Substitution types	Edit of substitution types in (f) Addition of (g) (i) and (ii)	Red & Lumo agree with the change and additions.
3.3.4 Type 14 – Like Day	Rewording to Type 14 – Retrospective Like Day	Red & Lumo agree with this rewording.
3.3.5 Type 15 – Average Like Day	Reworded to Type 15 – Retrospective Average Like Day	Red & Lumo agree with this rewording.
3.3.6 Type 16 – Agreed Method	Reworded to obsolete Type 16 – Agreed Method	Red & Lumo agree with making "Type 16 agreed method" obsolete.
3.3.8 Type 18 – Alternative	Reference for 3.2 (g)(ii) added Addition of (d)	Red & Lumo agree the additions.

3.3.10 Type 20 – Churn Correction	Rewording to Type 20 – Propsective Like Day Use definition edited	Red & Lumo agree with this rewording.
3.3.12 Type 22 – Prospective Average Like Day	New Substitution definition added Addition of table 4	Red & Lumo agree with the additions.
3.3.13 Type 23 – Previous Year	New Substitution definition added	Red & Lumo agree with the additions.
3.3.14 Type 24 – Data Scaling	New Substitution definition added	Red & Lumo agree with the additions.
3.3.15 Type 25 - ADL	New Substitution definition added	Red & Lumo agree with the additions.
11.2.1 NSW	Reference amended to 12.9.2	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
11.2.2 Queensland	Reference amended to 12.9.2	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
11.2.3 South Australia	Reference amended to 12.9.2	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
11.3.1 NSW & Queensland	Reference amended to 12.9.2	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.

11.3.2 South Australia	Reference amended to 12.9.2	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
11.4.1 Net System Load Profile	Reference amended to 12.9.2	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
11.4.2 Floor Value	Addition of new section in respect to the NSLP	Red & Lumo agree with the addition.
11.4.3 NSLP TI values below floor value	Addition of new section in respect to the NSLP	Red & Lumo agree with the additions.
11.5 Accumulation Meter Profiler – Net System Load Profile	Amended of reference to 12.9.2 in (a) Amended of reference to 11.4 in (c)	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2. We also agree to to the updated wording to include a reference to 11.4

5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
16.2 Participant	Removal of (h)	Red & Lumo agree to the removal.
16.2 Participant	Rewording of (i) Removal of (i) (ii)	Red & Lumo agree to the rewording and the removal. However, note the marked-up changes are not correctly marked up.

6. Service Level Procedure Embedded Network Manager Service

Section	Description	Participant Comments
4.2.1 Overview	Removal of (f)	Red & Lumo agree to the removal.

7. Additional Feedback

Participant Comments

Per the comments above regarding the MSATS Procedures: CATS Procedure Principles and Obligations and not being correctly marked up. Please see below for the correct markups commencing at 16.2.(g)
 	
 (g)   When initiating NMI Discovery Search 3, a retailer must ensure:
 	
    (i)   When using the reason code of TRI (Transferred In Error), they are the Current FRMP or the most recent previous FRMP for a given NMI. (This applies where the Current FRMP needs to request a retailer to transfer back a NMI transferred in error or the most recent previous FRMP has identified another retailer has transferred the NMI in error and is seeking to transfer it back.)
 	
    (ii)   When using the reason code of NNS (New NMI Setup Error – see Table 16-B), the NMI was created in the past 130 business days from the NMI Discovery Search 3 date.
 	
 ~~(h)   An MC may seek access to NMI Standing Data from MSATS in accordance with section 16.3.5 only for the purpose of identifying the NMI Classification of ‘LARGE’ in order to arrange a change of MC.~~
 	
 ~~(i)~~(h)   A~~n~~ ~~current or prospective~~ MC must~~:~~
 	
    ~~(i)~~   only carry out an MC Standing Data Search on NMIs where they are the Current MC.~~; or~~

(ii) ~~only perform MC Standing Data Search activity for the purpose of responding to a request from a large customer/retailer to assist in the appointment of the prospective MC.~~

~~(j)~~(i) The LNSP must:

(i) Only carry out a NMI Discovery Search 1 on any NMIs where they are the Current LNSP.

(ii) Only perform NMI Discovery Search 1 within its local area for the purpose of responding to a request from a retailer to assist in the resolution of a NMI Standing Data problem, or to perform quality checks of its data within MSATS.

(iii) Only carry out a NMI Discovery Search 2 on any NMIs where they are the Current LNSP.

(iv) Only perform NMI Discovery Search 2 activity within its local area for the purpose of responding to a request from a retailer to assist in the resolution of a NMI Standing Data problem, or to perform quality checks of its data within MSATS.

~~(k)~~(j) The ENM must only carry out a:

(i) NMI Discovery Search 1 on any NMIs where they are the Current ENM.

(ii) NMI Discovery Search 2 on any NMIs where they are the Current ENM.