



Metering Installation Exemption Automation

Consultation paper -
Standard consultation for the
National Electricity Market

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Explanatory statement and consultation notice

This consultation paper commences the first stage of the standard rules consultation procedure conducted by AEMO under clause 8.9.2 of the National Electricity Rules (NER) on the changes (Changes) which are proposed (Proposal) to the following Retail Electricity Market Procedures (Procedures) to implement the automated solution for the application process (Process):

- Exemption Procedure – Metering Installation Malfunctions made under NER 7.8.10(b) (Procedure).
- Exemption Guideline for Small Customers made under NER 7.8.3(a) (Guideline).
- Retail Electricity Market Procedures – Glossary and Framework.

The basis for the Changes is as follows:

- Currently, the Processes are manual and resource intensive. Participants fill in the relevant forms before transmitting the applications to AEMO via email. AEMO then processes these applications manually. The Process is time consuming and prone to human errors.
- In 2020, during the MSATS Standing Data Review consultation, industry participants proposed the addition of two new metering installation fields to MSATS (Fields), being:
 - Meter Malfunction Exemption Number field. This field holds the exemption number when a meter malfunction exemption has been granted by AEMO.
 - Meter Malfunction Exemption Expiry Date. This field holds the end date for which this exemption applies.

AEMO agreed to the proposal and added the Fields to the MSATS standing data in the implementation phase of the Standing Data Review. However, AEMO noted that the Fields would only be populated and updated once the Process had been automated, as it is not practical nor efficient for participants or AEMO to enter this information manually.

Consultation notice

AEMO is now consulting on this Proposal. 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 Friday 12 May 2023.

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. Please include supporting reasons.

Please note the following important information about submissions:

- All submissions will be published on AEMO's website, other than confidential content.
- 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

AEMO is consulting on the 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.

AEMO’s indicative process and timeline for this consultation are outlined below. Future dates may be adjusted, and additional steps may be included if necessary, as the consultation progresses.

Consultation steps	Dates
Consultation paper published	12 April 2023
Submissions due on consultation paper	12 May 2023
Draft report published	16 June 2023
Submissions due on draft report	17 July 2023
Final report published	21 August 2023

2. Background

2.1. Context for this consultation

In 2020, AEMO conducted industry workshops and collected participants feedback on the MSATS Standing data fields in preparation for the MSATS Standing Data Review consultation which commenced in February 2020¹. Industry participants proposed the addition of the Fields. This information would allow Metering Coordinators to better communicate exemptions relating to meter malfunctions to other market participants.

At the time, AEMO agreed with the majority of participants that:

- The addition of the Fields is beneficial.
- AEMO is the appropriate party to be responsible for updating and maintaining the Fields.

However, this would not be feasible without the automation of the Process, as it would not be practical nor efficient for participants or for AEMO to enter this information manually.

Accordingly, the proposal was that once AEMO automates the Process, Participants will be able to apply for exemptions online through the MSATS interfaces by entering the exemption details, thereby replacing the current manual process. AEMO would then assess the online application, rejecting or approving the application through the MSATS interfaces, which would see the system update the exemption details into the Fields. Participants associated with the exempt NMI(s) will be notified of those exemption details by MSATS.

As a result of the MSATS Standing Data Review consultation, AEMO added the Fields in the implementation phase of the MSATS Standing Data Review. However, AEMO noted that the Fields would be populated and updated, only once the Process is automated.

2.2. NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in 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 amended by AEMO in accordance with the Rules 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).
- Where considering options, select the one best aligned with the NEO.

The NEO is expressed in section 7 of the National Electricity Law 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

¹ Details for the MSATS Standing Data Review consultation can be found [here](#).

- (b) the reliability, safety and security of the national electricity system.

3. Proposal discussion

3.1. Metering Installation Exemption Automation

The automation of the Process includes:

- Metering installation malfunction exemption.
- Small customer metering installation exemption.

The proposed automated solution for both exemptions is quite similar.

3.1.1. Changing AEMO's determination timeframes

AEMO proposes to:

- Change the timeframe from two business days to five business days for AEMO to assign an exemption application with an exemption ID, notify participant of the receipt of the application and review the application, including requesting any additional information.
- Change the timeframe for AEMO's determination on approving the exemption application and communicating that determination to the applicant from:
 - five business days to ten business days after AEMO's receipt of the application, or
 - from two business days to five business days after AEMO's receipt of the relevant information, including any additional information.

AEMO proposes to change these timeframes due to the volume of exemption applications which AEMO has been receiving and the volume of notifications that AEMO has been sending to participants in respect of those exemptions. AEMO would still need to review the exemption applications and any of its supporting information manually, even after the exemption automation is implemented.

3.1.2. Application Process

AEMO is proposing to automate the Process by creating MSATS interfaces which participants can use to apply for exemptions, and for extensions to the current exemption applications.

Application Forms:

Metering Coordinators will no longer use the application forms listed in Appendix A or B of the Procedure, or the Guideline, to apply for an exemption or for an extension of an existing exemption. Instead, participants will use MSATS interfaces to apply for exemptions or extensions (where applicable) online.

Metering Coordinators will be able to add the NMI details associated with the exemption manually to the MSATS interfaces. Alternately they will have the option to upload the NMI details.

AEMO will review the applications submitted through the MSATS interface and update the review outcome through the MSATS interface.

Exemptions Notifications:

For metering installation malfunction exemptions only, once an exemption is approved, MSATS will:

- Raise a Change Request (CR5101) for each NMI to populate the standing data fields of Meter Malfunction Exemption Number and Meter Malfunction Exemption Expiry Date.
- Send a notification to all eligible participants as per the CATS Procedures, upon completion of the CR.

Only metering installation malfunction exemptions will have CR Notifications. Other exemption types will not be notified via CR Notifications.

For all exemption types, Metering Coordinators will be able to view and manage their exemptions through the MSATS interface once the exemption application has been successfully submitted. Metering Coordinators must monitor and manage the exemption progress as notifications, letters and correspondence will not be sent for metering exemptions. However, new Standing Data Quality (SDQ) checks will be included into the weekly report to Metering Coordinators. The SDQ checks will identify exemptions that are about to expire or have already expired and will notify if there is Metering Coordinator change on the NMIs associated with the exemption.

Additional Supporting Information:

The Process will be a two-step process with the application itself being performed within the MSATS interface. However, if any additional documentation is needed, then Metering Coordinators will need to send AEMO an email as they will not be able to edit the application in the MSATS interface. If AEMO has not received the relevant additional documentation when AEMO is reviewing the application, then AEMO will request that documentation and the application will be in the status of “more data needed” in the MSATS interface.

3.1.3. Managing Exemptions

Once AEMO has approved the exemption, AEMO’s approval will be reflected on the MSATS interface. Metering Coordinators will not be able to update the details of the exemption. However, they will be able to manage the exemption through the MSATS interface by:

- Actioning each of the NMIs by resolving the exemption or removing the NMI from the exemption.
- Subsequently, actioning the exemption by resolving the exemption, cancelling it, or extending the exemption (extensions are only applicable to metering installation malfunction exemptions).

3.1.4. Exemption Extension

Extension to small customer metering installation exemption applications is not allowed. If an exemption is still required, then a new application must be raised in the MSATS interface. The existing exemption will need to be cancelled and a new exemption application received.

Metering Coordinators may extend meter malfunction exemption applications in the MSATS interface prior to the expiry of the exemption. Extending an existing exemption application will send the exemption back for review. The participant should include details of when the extension is needed and a proposed new end date for the exemption. AEMO may then update the end date of the exemption during the approval process. Any additional information needed for the extension should be sent to AEMO via email.

3.2. Transition of existing exemptions

To support the management of exemptions, AEMO will transition all metering exemptions into MSATS where the end date of the exemption is greater than the go live date. The transition will include all NMIs registered against the exemption at the time of transition.

Metering Coordinators must update any NMIs that have been actioned after the transition date.

3.3. Description and effect of proposal

AEMO proposes to implement the Changes in the Procedures to reflect the automation of exemption applications and extensions and the end of using manual exemption application forms.

AEMO also developed a Metering Installation Exemption Guideline which is a new supporting document to help participants understand and navigate through the Process in the MSATS interface.

The Changes will result in changes to the current Process, as well as AEMO's systems for metering installation exemptions. AEMO will be designing and implementing a new MSATS interface to facilitate the exemption automation. Metering Coordinators processes and systems may also need to change, to align with the new automated process.

3.4. Proposed effective date

AEMO proposes 1 November 2023 as an effective date of the Changes to the Procedures, as well as the relevant system implementation, to align with other MSATS changes effective 1 November 2023.

Questions
<ul style="list-style-type: none">Do you agree with the 1 November 2023 effective date? If not, why not?

4. Drafting for proposed changes

To help interested parties respond to this consultation paper, AEMO has published:

- Draft Procedures, incorporating the Changes.
- Draft Metering Installation Exemption Guideline, to help participants understand how the online MSATS interface will be used for exemptions.

The clean and change-marked versions are available at <https://aemo.com.au/consultations/current-and-closed-consultations>.

Appendix A. Glossary

Term or acronym	Meaning
CATS	Consumer Administration and Transfer Solution, a part of MSATS.
MSATS	Market Settlements and Transfer Solution
NEM	National Electricity Market
NER	The National Electricity Rules made under Part 7 of the National Electricity Law
NMI	National Metering Identifier