

# Metering Installation Exemption Automation

Draft Report – 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

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## Executive summary and consultation notice

The publication of this draft report commences the second 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 (Automation) for the process (Process) to apply (Application) for a metering installation exemption (Exemption):

- 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 of the Proposal is as follows:

- The Process to apply for an exemption is manual and resource intensive. Participants must fill in the relevant forms before transmitting the application to AEMO via email. AEMO then processes these applications manually. The Process is time consuming and error prone.
- 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 in respect of an Exemption which has been granted by AEMO.
  - Meter Malfunction Exemption Expiry Date. This field holds the expiry date for the relevant Exemption.
- AEMO agreed to the proposal to add 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.

In response to the First Stage Consultation Paper, AEMO received 11 written submissions, including one late submission.

In those submissions, stakeholders raised the material issues in respect of the following matters:

- The effective date of the Changes
- The changes to AEMO's determination timeframes in respect of the Process.
- The addition of the MDP Action Plan details to the Procedure.

After considering the submissions received, AEMO's draft determination is to:

- Set the effective date to 1 November 2023 for the Changes to the Procedures to align with other MSATS changes effective 1 November 2023.
- Extend the timeframes for AEMO's determination on an Application. However, AEMO will clarify those extended timeframes further in the Procedure, to avoid confusion.
- Add to the Procedure the details of the timing and contents of the MDP Action Plan which is required to accompany an Application.

To enable the draft determination, AEMO proposes to amend the Procedures with the proposed effective date of 1 November 2023.

## Consultation notice

AEMO invites written submissions from interested persons on the Proposal and the issues identified in this Draft Report to [NEM.Retailprocedureconsultations@aemo.com.au](mailto:NEM.Retailprocedureconsultations@aemo.com.au) by 5:00 pm (Melbourne time) on Monday 17 July 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.

Before making a submission, please read and take note of AEMO's consultation submission guidelines, 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. AEMO 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.

AEMO’s process and expected timeline for this Consultation are outlined below. Future dates may be adjusted, and additional steps may be included as needed, as the Consultation progresses.

## Consultation process and timeline

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

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

AEMO’s consultation webpage for the Proposal is [here](#)<sup>1</sup>. The webpage contains all previous published papers and reports, written submissions, and other consultation documents or reference material.

In response to its Consultation Paper, AEMO received 11 written submissions.

AEMO thanks all stakeholders for their feedback on the Proposal to date, which has been considered in preparing this Draft Report. AEMO looks forward to further constructive engagement.

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<sup>1</sup> <https://aemo.com.au/consultations/current-and-closed-consultations/metering-installation-exemption-automation-consultation>

## 2. Background

### 2.1. Context for this consultation

In 2020, AEMO conducted industry workshops and collected participant feedback on the MSATS Standing data fields in preparation for the MSATS Standing Data Review consultation which commenced in February 2020<sup>2</sup>. 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 to update and maintain the Fields.

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, because it would not be practical or efficient for participants, or AEMO, to enter this information manually.

Accordingly, the proposal was that once AEMO automates the Process:

- A participant will be able to apply for an Exemption online through the MSATS interfaces, thereby replacing the current manual process.
- AEMO would assess the Application, then reject or approve the Application through the MSATS interfaces, which would see the system update the exemption details into the Fields in MSATS. A participant who is associated with the exempt NMI(s) would be notified of these details of the Exemption by MSATS.

### 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:

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<sup>2</sup> Details for the MSATS Standing Data Review consultation can be found [here](#).

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



## 3. Discussion of material issues

### 3.1. Effective Date

#### 3.1.1. Issue summary and submissions

In the Consultation Paper, AEMO proposed 1 November 2023 as the effective date of the Changes and the relevant system implementation. In stakeholder submissions, most respondents supported the proposed effective date, although some stakeholders raised issues and concerns as follows:

- AGL recommended that the Consultation be deferred until the outcome of the AEMC's Metering Review is released, to mitigate the risk that if the Proposal were to proceed, but the Process were removed by the AEMC, participants (and ultimately consumers) would have incurred costs to operationalise the soon-to-be obsolete reforms.
- Ausnet, CitiPower Powercor and United Energy were supportive of the proposed effective date. However, they recommend scheduling weekends for system releases and Monday or mid-week for procedure effective change dates.
- PLUS ES did not consider that the proposed effective date is achievable or practicable. The reasons include the lack of time for MCs to review and re-engineer their processes to align with the Automation, as well as the fact that the Procedure and the Guideline are not yet finalised. PLUS ES recommended at a minimum a March 2024 effective date.

#### 3.1.2. AEMO's assessment

AEMO assesses that regardless of the outcome of the AEMC's Metering Review, the Process in respect of metering installation types 4 and 4A will likely still be in place. Accordingly, Automation will still be required to some degree. AEMO considers that the AEMC's Metering Review should not affect the effective date of the Changes.

Regarding the scheduling proposals, AEMO notes that:

- The proposed effective date of the procedures is 1 November 2023, however the system changes will be released to production on Sunday 29<sup>th</sup> October 2023 to reduce impacts on participant BAU operations.
- The proposed effective date aligns with other MSATS changes which are effective 1 November 2023.
- The release may include the system changes in respect of other projects.

AEMO notes that:

- The functionality is available to an MC via the MSATS portal to manually submit an Application.
- The adequacy of time for an MC to review and re-engineer its processes to implement the Automation should not pose a risk, given a manual process is available to the MC to apply for the Exemption through the MSATS portal.

#### 3.1.3. AEMO's conclusion

AEMO determines that 1 November 2023 should be the effective date of the Changes to the Procedures, to align with other MSATS changes effective 1 November 2023. System implementation of changes will be released on the weekend prior to reduce impacts on participant BAU operations.

## 3.2. AEMO Determination Timeframes

### 3.2.1. Issue summary and submissions

In the Consultation Paper, AEMO proposed to extend the timeframe for AEMO's determination in respect of an Application, due to:

- the large volume of Applications which AEMO receives; and
- the large volume of notifications that AEMO sends to participants in respect of those Exemptions.

AEMO would still need to manually review an Application and any of its supporting information, even after the Automation is implemented.

In their submissions, some respondents supported the Change, while some stakeholders have raised issues and concerns, as follows:

- AGL considers that this Change is intended to accommodate the high volume of Applications which AEMO receives. However, AGL noted that the impact on industry has not been fully assessed. For example, the extended timeframes:
  - may allow an MC to attempt to rectify the metering installation malfunction in the first instance; or
  - may cause the MC to immediately apply for an Exemption, to ensure compliance with the meter malfunction replacement timeframes.
- PLUS ES recommended a review and re-write of the AEMO's Determination section of the Procedure, to reflect:
  - The detail which belongs in the Procedure versus the solution-based detail which belongs in the Guideline.
  - The validity and timing of certain obligations, given that the Fields will be visible in MSATS and/or the Process has been automated, including the timeframes, information provisioning, etc.
  - The 15+ business days timeline being additional to the period which the MC requires to determine that the meter is malfunctioning, and that the MC requires to apply for an Exemption. Potentially, a site could be malfunctioning for a period in excess of 5 weeks before an Exemption is approved and communicated to the participants who are associated to the NMI.
  - The Type 1-3 meter sites having a greater focus and a shorter remediation timeframe (2 business days) compared to Type 4 sites, due to the larger energy consumption and the potential settlement impact of the Type 1-3 sites. For market efficiency, PLUS ES recommends prioritising the Applications for the Type 1-3 sites for a faster turnaround and more timely market communication.
- PLUS ES noted that the Exemption commencement date should be the date on which the MC became aware of the malfunction, as per the date required to be populated in the current manual or proposed new online application form. Any delay to the Exemption commencement date due to administrative process tasks:
  - leaves the MC open to non-compliance; and

- means the MC constantly will be reporting sites which are in breach.
- Vector Metering:
  - Requested more details on how AEMO will communicate its determination.
  - Considered that participants should not be required to continuously monitor the AEMO Exemption Portal for the appearance of AEMO's determination.
  - Argued that AEMO should issue an email to the MC to indicate that an Exemption had been processed and a determination had been made. The MC would use this email as a trigger to respond accordingly.

Vector Metering and Alinta Energy proposed that the Exemption commencement date should be the Application submittal date, instead of the date(s) on which the additional supporting documentation is provided. Unlike the new two-step process, under the current process all necessary information generally is provided with the application. The new process introduces a delay before the additional supporting information can be sent. AEMO has 5 business days to provide the Exemption ID before additional supporting information can be emailed. This built-in delay can cause periods of non-compliance with the NER, while AEMO makes its determination.

### 3.2.2. AEMO's assessment

AEMO notes that the NER-specified timeframes to resolve a meter malfunction (being 15 business days for small customer metering installations and 2 business days for meter types 1-3) are different to the Procedure-specified timeframes for AEMO's determination of an MC's Application.

AEMO considers that AEMO's extended determination timeframes in the Procedure requires clarification. Accordingly, AEMO will review and amend the Procedure, to reflect the following timeframes:

- The exemption ID for the Application will be assigned and provided to the applicant within two business days of AEMO's receipt of the Application.
- Within 10 business days, AEMO must review the Application and, where necessary, request additional information, and make a determination on whether to approve the Application if additional information is not required, or if AEMO has received the required additional information.
- When AEMO requests additional information, the 10 business day timeframe will start from the date on which AEMO receives the additional information.

AEMO assesses that the Exemption commencement date is the date on which AEMO receives all required documents.

Multiple stakeholders recommended the removal of clauses from the Procedures which have become redundant due to the Process. However, AEMO assesses that these clauses cannot be removed, because the Procedure needs to include the relevant obligations. As a solution, the Automation does not remove the obligations. The Guideline is a supporting document which does not replace the Procedure.

AEMO will communicate the exemption application outcome through the MSATS portal for all exemption types. Metering installation malfunctions exemptions only, will also have the Fields in MSATS populated using the CR5101 change request, and CR completion notifications will be sent to all relevant participants as per the MSATS procedures. AEMO considers that the Process eliminates the need to send emails to notify participants of Application status updates.

### 3.2.3. AEMO's conclusion

AEMO concludes that the extension of the AEMO Exemption determination timeframes is necessary, due to the large volume of exemption applications received. However, AEMO will clarify those extended timeframes in the Procedure, to avoid confusion.

## 3.3. MDP Action Plan

### 3.3.1. Issue summary and submissions

In the Consultation Paper, AEMO clarified the timing and the contents of the MDP Action Plan for HV and LV sites, which must be provided with an Application.

In their submissions, some respondents supported the proposed change while some raised issues and concerns, including as follows:

- Intellihub did not support the additional obligation on MCs to provide a MDP Action Plan for HV and LV CT sites. Intellihub argued that this obligation would add administrative responsibility for minimal benefit. In particular, MDPs are accredited participants who are obligated to comply with the metrology procedures for substitutions, who are regularly audited. In addition, impacted participants have the right to request the MDP to change the substitution, if they consider the substitution is not appropriate for a NMI. Intellihub also noted that the NER does not require a MDP Action Plan in respect of an Exemption.
- PLUS ES supported the rationale to include the MDP Action Plan. However, PLUS ES questioned the additional value which this obligation would deliver. PLUS ES noted that the MDP's actions are governed by the MDP SLP and Metrology Procedure Part B. PLUS ES argued that the inclusion increases the administrative cost to both the MC and AEMO, at no additional benefit. Accordingly, PLUS ES proposed that the MDP Action Plan requirement should be removed.
- Vector Metering noted that the MDP Rectification Plan is not required under the NER. Accordingly, Vector Metering did not support its inclusion. Vector Metering stated that the majority of the relevant types of Exemption are raised on sites with legacy metering, which means that the DNSP remains in the metering roles, until the meter is exchanged. The contestable MC does not have a relationship with the legacy MDP (DNSP) such as would require it to provide a Rectification Plan. Vector Metering noted that MDPs already provide most of the information proposed in the Procedure. The MDP is required to provide the substitution method and reason in the NEM12/NEM13 file when the MDP creates the substitute reads. The MDP will not be able to provide any information on the period for which the substitutions will be provided, because the MDP does not control the scheduling of the rectification. Instead, the MC and New MP (who is not yet in the role of MP) perform this function.
- Yurika Metering supported the change. However, Yurika Metering noted that MCs would need to work with their Metering Providers and MDPs, to ensure these participants have the necessary processes in place to determine data impacts and substitution requirements prior to the MC completing the Application. This step will allow the required supporting documentation (MP Rectification Plan and MDP Action Plan) to be provided to AEMO via email within the required timeframes.

### 3.3.2. AEMO's assessment

AEMO assesses that the addition and the clarification of the MDP Action Plan in the Procedure is not an additional obligation on participants.

In this regard, currently, the Procedure requires details of:

- The instructions given to MP and MDP related to a malfunction rectification (Appendix A, Item 10).
- The manner of the provision of the metering data (Appendix B, Item 11)

This requirement provides assurance to AEMO that relevant methodologies will be used to facilitate energy market settlements.

### 3.3.3. AEMO's conclusion

AEMO concludes that the clarification of the timing and contents of the MDP Action Plan should be added to provide assurance to AEMO that relevant methodologies will be used to facilitate energy market settlements.

## 4. Other matters

### 4.1. Small Customer Metering Installation Exemption Procedure

The timeframe for submitting a new Application has been aligned between the different sections of the Procedure, to be at least 30 business days before the expiry date of the original Exemption.

The status used for requesting more information has been corrected to be “More Info”, instead of “More Data”.

## 5. Draft determination on proposal

Having considered the matters raised in submissions in respect of the Consultation Paper, AEMO's draft determination is to amend the Procedures to:

- Set the effective date to 1 November 2023 for the Changes to the Procedures to align with other MSATS changes effective 1 November 2023.
- Extend the timeframes for AEMO's determination on an Application. However, AEMO will clarify those extended timeframes further in the Procedure, to avoid confusion.

Add to the Procedure the details of the timing and contents of the MDP Action Plan which is required to accompany an Application. The following Procedures are to be amended in the form published with this Draft Report, in accordance with the NER:

- Exemption Procedure – Metering Installation Malfunctions.
- Exemption Guideline for Small Customers.
- Retail Electricity Market Procedures – Glossary and Framework.

The updated Guideline will also be published with this Draft Report, to help participants to understand the manner in which the online MSATS interface will be used in respect of the Exemptions.

## Appendix A. Glossary

Term or acronym	Meaning
CATS	Consumer Administration and Transfer Solution, a part of MSATS.
DNSP	Distribution Network Service Provider
MDP	Metering Data Provider
MP	Metering Provider
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



## Appendix B. List of Submissions and AEMO Responses

**Table 1 Feedback on the Metering Installation Exemption Automation Effective Date**

No.	Question	Stakeholder	Participant comments	AEMO response
1	Do you agree with the 1 November 2023 effective date? If not, why not?	Alinta Energy	Agree	AEMO notes the respondent's agreement with the proposed effective date.
2	Do you agree with the 1 November 2023 effective date? If not, why not?	AusNet	Yes, but we prefer weekends for system releases and Monday's for procedure effective change dates.	AEMO notes the respondent's agreement with the proposed effective date.  AEMO notes that the proposed effective date of the procedures is 1 November 2023, however the system changes will be released to production on Sunday 29th October 2023 to reduce impacts on participant BAU operations.
3	Do you agree with the 1 November 2023 effective date? If not, why not?	CitiPower Powercor	CitiPower Powercor is supportive of a November 2023 effective date but strongly recommend not having mid-week go-lives, where system go-lives are on Sunday and procedural go-lives are mid-week.  CitiPower Powercor strongly recommends a weekend go-live and procedural effective date from Monday.	AEMO notes the respondent's <b>agreement with</b> the proposed effective date and refers to the response in table 1, item 2.
4	Do you agree with the 1 November 2023 effective date? If not, why not?	Intellihub	Yes	AEMO notes the respondent's agreement with the proposed effective date.
5	Do you agree with the 1 November 2023 effective date? If not, why not?	Jemena	Jemena does not have any issue with 1 Nov 23 effective date.  Vic Government issued OIC which exempts Victorian LNSPs from complying with NER Clauses 7.8.3 and 7.8.4 in their role	AEMO notes the respondent's agreement with the proposed effective date.  AEMO notes the respondent's comment regarding the Vic Government OIC.

No.	Question	Stakeholder	Participant comments	AEMO response
			of MC for the relevant metering installation (i.e. Vic AMI meters).	
6	Do you agree with the 1 November 2023 effective date? If not, why not?	Origin Metering Coordinator	Yes – assuming no significant changes to the existing scope.	AEMO notes the respondent’s agreement with the proposed effective date.
7	Do you agree with the 1 November 2023 effective date? If not, why not?	PLUS ES	<p>PLUS ES does not think that the proposed effective date is achievable or practicable, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The MC must be allowed an appropriate timeframe to review, re-engineer and operationalise their processes to align with the proposed automated process and subsequent changes to the procedures. In some instances this may require system enhancements.</li> <li>• The procedures have not been finalised.</li> <li>• The guideline is missing detail creating gaps in the user knowledge of the E2E process, in its current state.</li> <li>• The MC requires the ability to see and use the portal supporting the development of their internal operational documents such as work instructions.</li> <li>• In some instances MC may have to liaise with multiple MP stakeholders to bilaterally agree on processes.</li> <li>• Ideally this would require a 6-month timeframe. Since the industry still finds themselves in consultation, the publication of the final documentation will allow less than 4months to meet the effective date 1 Nov 2023.</li> <li>• If the effective date was to be extended, PLUS ES would recommend at a minimum a March 2024 date, as: <ul style="list-style-type: none"> <li>○ Dec and Jan are resource challenged months due to the Christmas Shut down period and personnel leave.</li> <li>○ At least one month of preprod is required before Go-live, i.e. Feb.</li> </ul> </li> </ul>	AEMO notes the respondent’s comment and clarifies that there is manual functionality available for MCs via the MSATS portal to apply for the metering installation exemptions.

No.	Question	Stakeholder	Participant comments	AEMO response
8	Do you agree with the 1 November 2023 effective date? If not, why not?	United Energy	<p>United Energy is supportive of a November 2023 effective date but strongly recommend not having mid-week go-lives, where system go-lives are on Sunday and procedural go-lives are mid-week.</p> <p>United Energy strongly recommends a weekend go-live and procedural effective date from Monday.</p>	AEMO notes the respondent's agreement with the proposed effective date and refers to the response in table 1, item 2.
9	Do you agree with the 1 November 2023 effective date? If not, why not?	Vector Metering	Agreed, if all the issues can be resolved.	AEMO notes the respondent's agreement with the proposed effective date.
10	Do you agree with the 1 November 2023 effective date? If not, why not?	Yurika Metering	Yurika Metering is supportive of the proposed effective date.	AEMO notes the respondent's agreement with the proposed effective date.

**Table 2 Exemption Procedure (Metering Installation Malfunctions)**

No.	Section	Description	Stakeholder	Participant comments	AEMO response
1	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	Alinta Energy	Agreed	AEMO notes the respondent's agreement with the proposed change.
2	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption	CitiPower Powercor	No comment	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		Framework which might be made in the NER			
3	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
4	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	Origin Metering Coordinator	No comments	
5	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	United Energy	No comment	
6	1.4 Metering Exemption Framework	Added a new section to note that the procedure may	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		change subject to the changes to the Metering Exemption Framework which might be made in the NER			
7	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Alinta Energy	Agreed	AEMO notes the respondent's agreement with the proposed change.
8	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	CitiPower Powercor	No comment	
9	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
10	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Origin Metering Coordinator	No comments	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
11	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	PLUS ES	<p>Typo – in conjunction requires a space after in.</p> <p>The intention of the Metering Installation Exemption Guideline is to assist metering co-ordinators (MC) with the application and management of metering exemptions rather than to process the application.</p> <p>PLUS ES proposes to amend the wording from:</p> <p>...required to enable Metering Coordinators to <b>process the application</b> to</p> <p>...required to enable Metering Coordinators to <b>apply and manage their metering installation exemptions.</b></p>	AEMO agrees with the respondent's comment regarding the typo and the rewording of the clause and will update the procedure accordingly.
12	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	United Energy	No comment	
13	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
14	2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	Alinta Energy	Agreed	AEMO notes the respondent's agreement with the proposed change.
15	2.2 Timing of Application	Deleted reference to Appendix A due to	CitiPower Powercor	No comment	

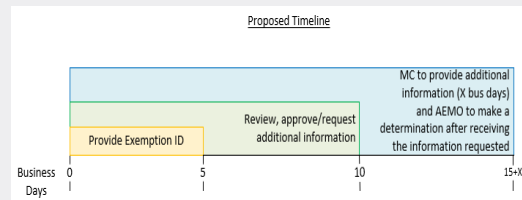
No.	Section	Description	Stakeholder	Participant comments	AEMO response
		exemption process automation			
16	2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
17	2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	Origin Metering Coordinator	No comments	
18	2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	PLUS ES	PLUS ES for consistency recommends <b>metering installation</b> exemption application, replacing <b>meter</b> exemption application.	AEMO agrees with the respondent's comment and will update the procedure accordingly.
19	2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	United Energy	No comment	
20	2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
21	2.3 AEMO's Determination	Increased AEMO's determination timeframes due to high number of applications received.  Added clarification that the new	Alinta Energy	Agreed and understood	AEMO notes the respondent's agreement with the proposed change.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		automated exemption process will be two steps process.			
22	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	CitiPower Powercor	CitiPower Powercor would like clarification on Section 2.3 (a) (ii). The Guideline section 4.5 and 4.9 outline that a CR5101 will be received once the CR completes. Can clarification be sought on what is contained in this CR5101 i.e. does it only contain the Meter Malfunction Exemption fields?	AEMO clarifies that CR5101 only contains the Meter Malfunction Exemption fields and will send notification to all relevant participants once CR is completed.
23	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
24	2.3 AEMO's Determination	Increased AEMO's determination timeframes due to high number of applications received.	Origin Metering Coordinator	No comments	



No.	Section	Description	Stakeholder	Participant comments	AEMO response
		Added clarification that the new automated exemption process will be two steps process.			
25	2.3 AEMO's Determination	General	PLUS ES	<p>PLUS ES recommends a review and re- write of this section taking into consideration:</p> <ul style="list-style-type: none"> <li>Detail which belongs in the procedure versus solution-based details which should be captured in the Metering Installation Exemption Guideline.</li> </ul> <p>The validity and timing of some of the obligations now that the exemption ID fields will be visible in MSATS and/or the process has been automated including but not limited to the timeframes, provisioning of information etc.</p>	AEMO notes the respondent's comment and refers to the responses in table 2, items 26 to 30.
26	2.3 AEMO's Determination (a)	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	PLUS ES	<p>PLUS ES recommends that this clause is removed. This clause is redundant given that the action is no longer manual - the MSATS portal will be providing the Unique ID upon submission and validation and assumed almost real time once the NMI/s has been uploaded.</p> <p>Additionally, the timing of the provisioning of an Exemption ID is not clearly identified in any of the associated documents. Confirmation of the timeframe is required to support the MCs in developing their operational processes/instructions. This detail should be made available in the Metering Installation Exemption Guideline.</p>	<p>AEMO notes that the clause cannot be removed as the procedure still needs to include the relevant obligations. The exemption automation is a solution and does not remove the obligations and the Metering Installation Exemption Guideline is a supporting document for the exemption procedures.</p> <p>AEMO notes the respondent's comment regarding the timeframes and will review and update the procedure for clarity.</p>
27	2.3 (a)(i)	Added clarification that the new automated exemption	PLUS ES	<p>PLUS ES suggests the following:</p> <ul style="list-style-type: none"> <li>for clarity, exemption extension context should be in a standalone section rather than incorporated in other sections.</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 2, item 26.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		process will be two steps process.		<ul style="list-style-type: none"> <li>The additional detail provided would be best situated in the Metering Installation Exemption Guideline as it is detail relating to the automated solution.</li> </ul>	
28	2.3 (a)(ii)		PLUS ES	<p>PLUS ES suggests the following:</p> <ul style="list-style-type: none"> <li>The additional details with respect to notification to other participants associated with the NMI should be in their own clause.</li> <li>For clarity, it should also be noted that only approved exemption applications will be updated in MSATS.</li> <li>To update MSATS with exemptions details one assumes the application is approved. Hence, we recommend that this detail should be included in section 2.5 Grant of Exemption.</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 2, item 26.
29	2.3 (b)	Additional context added.	PLUS ES	PLUS ES recommends that the additional details should be removed from this procedure and captured in the Metering Installation Exemption Guideline, as it is detail relating to the automated solution.	AEMO notes the respondent's comment and refers to the response in table 2, item 26.
30	2.3 (b)	Last paragraph referring to timeframes	PLUS ES	<p>As this process is being automated via portal, PLUS ES recommends:</p> <ul style="list-style-type: none"> <li>Defining receipt of an application in context to the automated process</li> <li>AEMO reviews the E2E timeframe with the proposed extended timeframes in this clause and considers the downstream impacts.</li> </ul>	<p>AEMO notes the respondent's comment and refers to the response in table 2, item 26.</p> <p>Regarding the respondent's comment on the timeframes for fixing a meter malfunction, AEMO notes that under the rules, MCs have 15 business days to fix the meter malfunction for small customer metering installations and 2 business days for meter types 1-3. However, once the MC applies for an exemption to AEMO then the exemption procedure timeframes take place and the AEMO exemption process starts.</p>



No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<ul style="list-style-type: none"> <li>The 15+ business days timeline is additional to the period it takes the MC to determine the metering is malfunctioning and they need to apply for an exemption. Potentially a site could be malfunctioning for a period in excess of 5 weeks before an exemption is approved and communicated to participants associated to the NMI. For this reason, more timely market communications, PLUS ES recommends where practicable, AEMO reconsiders the existing and proposed timeframes in provisioning exemptions.</li> <li>Type 1-3 meters: These sites have a greater focus and a shorter remediation timeframe (2 business days) compared to Type 4 metering due to their larger energy consumption and the potential impact to settlements. For market efficiency, PLUS ES recommends prioritising exemption applications for these sites for a faster turnaround and more timely market communication.</li> </ul>	
31	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	United Energy	United Energy would like clarification on Section 2.3 (a) (ii). The Guideline section 4.5 and 4.9 outline that a CR5101 will be received once the CR completes. Can clarification be sought on what is contained in this CR5101 i.e. does it only contain the Meter Malfunction Exemption fields?	AEMO notes the respondent's comment and refers to the response in table 2, item 22.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
32	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	Vector Metering	<p>2.3(b) currently says "... AEMO must determine whether to approve the application and <b>communicate</b> that determination to the applicant."</p> <ul style="list-style-type: none"> <li>More detail is required in this clause on how AEMO will communicate its determination. We understand that AEMO believes participants are to continuously monitor the AEMO Exemption Portal to see AEMO's determination and that this fulfils the communication requirements under the solution. If this is the case then we don't agree, we believe AEMO should issue an email to the MC indicating that a exemption has been processed and a determination has been made. This can be used by the MC as a trigger to respond accordingly. i.e. where further information is required the MC is aware and can commence. It is important that this is to be understood as it drives internal processes for MC's.</li> </ul>	AEMO notes that exemption related communication will be through the MSATS portal and the CR5101 notifications, the automation process eliminates the requirement for sending emails.
33	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
34	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Alinta Energy	Date of commencement should be the date the exemption is applied for. Current process is to provide all necessary information up front at time of lodgement. New process requires delay in provision of additional information. AEMO has 5 days to provide Exemption ID before additional information can be emailed. This may	AEMO notes the respondent's comment and will review and clarify the exemption process timeframes in section 2.3 of the procedure.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				cause periods of non-compliance while AEMO make determination.	
35	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	CitiPower Powercor	No comment	
36	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
37	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Origin Metering Coordinator	No comments	
38	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	PLUS ES	<p>PLUS ES suggests the following for greater efficiency:</p> <ul style="list-style-type: none"> <li>Clarifying the commencement exemption date – Defining a date as ...whichever is the greater, is left to interpretation.</li> <li>The commencement of the exemption date should be the date the MC became <b>aware</b> of the malfunction, as per the date required to be populated in the current manual or proposed new online application form. Any delays to the exemption commencement date due to administrative process tasks leaves the MC open to non-compliance and they will always be reporting sites that are in breach.</li> <li>Exemptions granted on a conditional basis – whilst it is mentioned in the procedure further detail is required in the Metering Installation Exemption Guideline to assist the MC to develop their operational processes. That is, <ul style="list-style-type: none"> <li>The mechanism via which the conditions will be communicated to the MC.</li> <li>Will the MC have to monitor or will a communication be provided to the MC.</li> <li>If AEMO were to revoke the exemption: <ul style="list-style-type: none"> <li>The mechanism to notify the MC.</li> <li>Will the MC have to monitor the</li> </ul> </li> </ul> </li> </ul>	<p>AEMO notes the respondent's comment regarding the timeframes and will review and clarify the exemption process timeframes in section 2.3 of the procedure.</p> <p>Regarding the respondent's comment on granting exemptions on a conditional basis, AEMO clarifies that if an exemption application is approved with conditions, the conditions details will display in the exemption history section on the right hand side of the exemption detail window the MSATS portal.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				status or will a communication be provided to the MC.	
39	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	United Energy	No comment	
40	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Vector Metering	<p>2.5 An exemption granted by AEMO will commence on the date that AEMO received the application via MSATS and <b>completed supporting documentation</b> (if required) via the email process (whichever the greater).</p> <ul style="list-style-type: none"> <li>Date of commencement should be date that exemption was applied for, <b>not</b> when supporting documentation is provided. Unlike the current process where all necessary information is generally provided with the application, this is not the case under the new two-step process. The new process introduces delay before any additional information can be sent. AEMO has 5 business days to provide the Exemption ID before addition info can be emailed. This built-in delay can cause periods of non-compliance with the rules while AEMO make determination. If AEMO makes a favourable determination then the exemption should commence on the date that the exemption application applied for. The date that AEMO made the exemption should be visible for audit processes.</li> </ul>	<p>AEMO notes the respondent's comment regarding the timeframes and will review and clarify the exemption process timeframes in section 2.3 of the procedure.</p> <p>AEMO notes that the exemption starts from the date AEMO receives all required documents, and that the exemption approval date will be visible for audit processes along with the exemption application date.</p>
41	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
42	2.6 Application Unsuccessful	<p>deleted the following point:</p> <p>(a) A failure to complete the application form;</p>	Alinta Energy	understood	AEMO notes the respondent's comment.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
43	2.6 Application Unsuccessful	deleted the following point: (a) A failure to complete the application form;	CitiPower Powercor	No comment	
44	2.6 Application Unsuccessful	deleted the following point: (a) A failure to complete the application form;	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
45	2.6 Application Unsuccessful	deleted the following point: (a) A failure to complete the application form;	Origin Metering Coordinator	No comments	
46	2.6 Application Unsuccessful	deleted the following point: (a) A failure to complete the application form;	United Energy	No comment	
47	2.6 Application Unsuccessful	deleted the following point: (a) A failure to complete the application form;	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
48	2.7 Extension to Exemption	Deleted reference to Appendix B.  Added a new section about AEMO's	Alinta Energy	understood	AEMO notes the respondent's comment.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		notification of expiring exemptions and the process of extension.			
49	2.7 Extension to Exemption	Deleted reference to Appendix B.  Added a new section about AEMO's notification of expiring exemptions and the process of extension.	CitiPower Powercor	No comment	
50	2.7 Extension to Exemption	Deleted reference to Appendix B.  Added a new section about AEMO's notification of expiring exemptions and the process of extension.	IntelliHub	We suggest AEMO add detail on how they will notify the MC and mention this will be by the SDQ reports as a clarification.	AEMO notes this is a technical detail which is mentioned in the Metering Installation Exemption Guideline, technical solutions are not included in the procedures as it might change in the future.
51	2.7 Extension to Exemption	Deleted reference to Appendix B.  Added a new section about AEMO's notification of expiring exemptions and the process of extension.	Origin Metering Coordinator	No comments	



No.	Section	Description	Stakeholder	Participant comments	AEMO response
52	2.7 Extension to Exemption	<p>Deleted reference to Appendix B.</p> <p>Added a new section about AEMO's notification of expiring exemptions and the process of extension.</p>	PLUS ES	<p>PLUS ES suggests that new section does not belong in the Procedure. The detail is applicable in the Metering Installation Exemption Guideline.</p> <p>Feedback for the additional information:</p> <ul style="list-style-type: none"> <li>• 14 business days timeframe – Due to the potential downstream impacts on the exemption application, PLUS ES recommends that the timeframe is at least 20 bus days. This would also facilitate use cases where the MC is non transactional and needs to liaise with the MP to decide whether an extension is required.</li> <li>• Closed Status – <ul style="list-style-type: none"> <li>○ Further clarification is required with the timing details of actions with respect to submitting an extension (Noting the details should reside in the Metering Installation Exemption Guideline): <ul style="list-style-type: none"> <li>▪ The timing where the exemption will be closed. E.g the business day following the expiry date? When would one expect the data to be removed from MSATS?</li> <li>▪ A submitted extension application has not been actioned by the expiry date, will that trigger the exemption to be closed? If so, the AEMO notification timeframe of pending exemption expirations needs to be extended accordingly.</li> </ul> </li> </ul> </li> </ul>	<p>AEMO notes that the section cannot be removed as the procedure still needs to include the relevant obligations. The exemption automation is a solution and does not remove the obligations and the Metering Installation Exemption Guideline is a supporting document for the exemption procedures.</p> <p>AEMO notes that they have increased the timeframe to 21 business days.</p> <p>Regarding the Closed status, AEMO will review the section in the procedure and update it for clarity.</p> <p>AEMO notes that a submitted extension application which has not been actioned by the expiry date, will trigger the exemption to be expired.</p>
53	2.7 Extension to Exemption	<p>Deleted reference to Appendix B.</p> <p>Added a new section about AEMO's</p>	United Energy	No comment	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		notification of expiring exemptions and the process of extension.			
54	2.7 Extension to Exemption	<p>Deleted reference to Appendix B.</p> <p>Added a new section about AEMO's notification of expiring exemptions and the process of extension.</p>	Vector Metering	<p>2.7. Extension to Exemption - "AEMO will notify the current MC up to 14 business days prior to the exemption expiring – "</p> <ul style="list-style-type: none"> <li>We believe there should be 20 Business days notice of an expiry of an exemption. This is to allow for the process of reapplying to be completed before expiry of exemption, otherwise MC may find themselves in breach of rules for a period of time while AEMO make their determination.</li> <li>This clause also refers to a 'closed status' "...exemption will be updated to a Closed status' which doesn't appear to exist in the exemption life cycle (Appendix A 5.1.4. Exemption Status codes in the Guideline). Maybe it means 'Resolved'? Please clarify if this closed status is correct.</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 2, item 52.
55	2.7 Extension to Exemption	<p>Deleted reference to Appendix B.</p> <p>Added a new section about AEMO's notification of expiring exemptions and the process of extension.</p>	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
56	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point	Alinta Energy	understood	AEMO notes the respondent's comment.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		to align with the automation process.			
57	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	CitiPower Powercor	No comment	
58	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	Intellihub	<p>Clause 2.8.b: We understand the new process will be that when AEMO approves an exemption or an extension to an exemption then AEMO will inform the market by updating MSATS and impacted participants will be notified via MSATS notifications.</p> <p>Therefore, we believe the obligation on MCs to notify participants is now redundant and we suggest that this be removed from this clause.</p> <p>Clause 2.8.b: We understand that the key information in a rectification plan is the date when a malfunction will be resolved. We believe that this key information will be communicated to impacted participants via the new field called Meter Malfunction Exemption Expiry Date. Therefore, we believe the obligation on MCs to provide impacted participants a copy of the MP's rectification plan is redundant and we suggest that this be removed from this clause.</p> <p>Clause 2.8.b: If AEMO was to maintain this clause then we suggest that the timeframe be extended from 1 business day to 5 business days. We agree with AEMO</p>	<p>Clause 2.8.b: AEMO notes that the obligations in the procedures need to remain and cannot be removed because of the automation, the automation may provide a solution to participants to achieve their obligation, however the obligation needs to remain. AEMO also notes that the MP's rectification plan contains more information than just the Meter Malfunction Expiry Date and that one business day is sufficient time for the notification.</p> <p>Clause 2.8.e: AEMO notes that the obligations in the procedures need to remain and cannot be changed because of the automation, the automation may provide a solution to participants to achieve their obligation, however the obligation needs to remain</p> <p>Clause 2.8.f: AEMO notes that the obligations in the procedures need to remain and cannot be changed because of the automation, the automation may provide a solution to participants to achieve their obligation, however</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>that the volume of exemptions getting raised warrants all parties involved in the process be afforded additional time for manual steps, which would include the obligations defined in this clause.</p> <p>Clause 2.8.e: Notification of when a malfunction is rectified will now be achieved via the automation process and affected Participants will be notified from MSATS. We suggest this clause be reworded to:</p> <p style="padding-left: 40px;">Notify AEMO when the metering installation malfunction has been rectified by updating the status of the NMI to Resolve as per the Meter Exemption Guideline.</p> <p>Clause 2.8.f: We believe with automation this process could be made more effective by removing manual obligation on the old MC and instead let the new MC utilise the ME_MC_CHURN SDQ report. In addition, given the SDQ report is to be scheduled weekly we believe that providing 10 business days for the new MC to apply for an exemption is more achievable. We also don't believe that the old MC should have to provide the MP's rectification plan to the new MC because the new MC will nominate their own MPB rendering this rectification plan obsolete as it will have no relevance on how/when the site will be rectified especially in the bulk exemption scenario. Therefore, we suggest that this clause be reworded to:</p> <p style="padding-left: 40px;">Must use the ME_MC_CHURN SDQ report and if necessary apply for an exemption</p>	<p>the obligation needs to remain. AEMO notes that five business days is a sufficient time for this obligation.</p> <p>AEMO notes that the MC obligations in clauses 2.8 (b), (c), and (d) is applicable to all types of metering installations (Types 1-6), HV large, LV CT and small customer metering installations, and affected Participants are made aware for them to plan and factor the equipment malfunction in their network activities and other market related activities.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				within 10 business days from when they became the MC.	
59	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	Origin Metering Coordinator	No comments	
60	2.8 Current MC's Obligations during the Exemption Period	Clause (b)	PLUS ES	<p>PLUS ES supports the removal of this clause due to the new solution and the availability of the information in MSATS:</p> <ul style="list-style-type: none"> <li>PLUS ES recalls in the MS DR workshops that participants lobbied to have the exemption ID and expiry date in MSATS to drive operational efficiencies and market communications. The CR notifications to all affected participants will deliver the information.</li> <li>The exemption process has been implemented for 5+ years. What may have been appropriate for the introduction of small customer meter contestability does not necessarily mean it remains efficient with current knowledge and newly proposed processes.</li> <li>It is our understanding that other affected participants do not use/refer to that information. There is an opportunity with an automated process to reduce administrative 'noise'. For large sites, if a Retailer requires that information, they could always request it from the MC.</li> <li>The NER only requires the MP rectification plan to be provided to AEMO.</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 2, item 58.
61	2.8 Current MC's Obligations during	Clause (d)	PLUS ES	PLUS ES proposes that the clause is reworded to only obligate the MC to keep AEMO informed of any changes. That is, remove the obligation to keep other	AEMO notes that the MC obligation in clause 2.8(d) is applicable to all types of metering installations (Types 1-6), HV large, LV CT and

No.	Section	Description	Stakeholder	Participant comments	AEMO response
	the Exemption Period			<p>participants informed and provide them a copy of the MP rectification plan.</p> <ul style="list-style-type: none"> <li>The exemption process has been implemented for 5+ years. What may have been appropriate for the introduction of small customer meter contestability does not necessarily mean it remains efficient with current knowledge and newly proposed processes.</li> <li>It is our understanding that other affected participants do not use/refer to that information. There is an opportunity with an automated process to reduce administrative 'noise'. For large sites, if a Retailer requires that information, they could always request it from the MC.</li> <li>The NER only requires the MP rectification plan to be provided to AEMO.</li> </ul>	<p>small customer metering installations, and affected Participants are made aware in order for them to plan and factor the equipment malfunction in their network activities and other market related activities.</p>
62	2.8 Current MC's Obligations during the Exemption Period	Clause (e)	PLUS ES	<p>PLUS ES suggests that the clause is reworded to align the obligation with the proposed new automated process via MSATS. i.e. the MC must update the status of the NMI when the metering installation malfunction has been rectified.</p> <p>By updating the status of the NMI/Exemption ID in MSATS portal the system will trigger an update in the associated MSATS fields. AEMO and all affected participants will be notified.</p>	<p>AEMO notes the respondent's comment and refers to the response in table 2, item 58.</p>
63	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	PLUS ES	<p>PLUS ES proposes for efficiency, the removal of the MC obligation in its entirety:</p> <ul style="list-style-type: none"> <li>Exemptions are not transferrable between MCs</li> <li>The MC has a relationship with the MP and could always request the information/MP rectification plan if required.</li> <li>The incoming MC may not decide to keep the MP and the reasons supporting the original exemption may not be applicable.</li> <li>For market efficient practices, AEMO to extend the MC Churn report to be provided to</li> </ul>	<p>AEMO notes the respondent's comment and refers to the response in table 2, item 58.</p> <p>Regarding extending the MC Churn report to both MCs, AEMO notes that the change of MC change request will notify the old MC that they are no longer the MC, and the churn report will be provided to the new MC.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				both MC recipients - the 'old' and the 'new' MC. The old MC will not have to notify the new MC.	
64	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	United Energy	No comment	
65	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	Vector Metering	<ul style="list-style-type: none"> <li>2.8(b) Within one 1 business day, notify all affected Participants of the grant of the exemption and any extension to the exemption and provide them with a copy of the MP's rectification plan; -</li> </ul> <p>There are notification obligations in 2.8 that appear unnecessary given affected parties will receive notification via CATS CR's and details of the exemption will appear in MSATS. We believe these notifications obligations on the MC should be removed or at least acknowledge that the CATS CR's generated by the AEMO's automation meet these requirements.</p> <p>28(b) also links the provision of the MP's rectification plan with the notification obligation. This will create a cumbersome process for MC who will need to take further steps upon notification of approval by AEMO to then send the rectification plan to all participants. We believe that the key information from the rectification plan that parties are interested in is the date that the malfunction is planned to be resolved by. This will now be available in MSATS. We believe that the provision of the rectification plan should be on request to the MC/MP.</p>	<p>AEMO notes that the MC obligations in clause 2.8(b) is applicable to all types of metering installations (Types 1-6), HV large, LV CT and small customer metering installations, and affected Participants are made aware for them to plan and factor the equipment malfunction in their network activities and other market related activities.</p> <p>CL2.8(e): AEMO notes the respondent's comment and refers to the response in table 2, item 58.</p> <p>Regarding the suggested improvement, AEMO notes that this is out of scope for this consultation and suggests that the participant raise an ICF for this through the ERCF.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>This would allow parties who are interested in the details of the rectification plans can receive it while others who aren't, don't.</p> <ul style="list-style-type: none"> <li>CL2.8(e) Notify AEMO and all affected Participants when the metering installation malfunction has been rectified; - Assuming that the MC will remove the NMI from the 'live' exemption and this will be communicated via the CR5150. This clause should be reworded to acknowledge this and only obligate the MC to update the Exemption portal. Remove or reword to only notify AEMO.</li> <li>A suggested improvement: If a meter is replaced at a NMI and the NMI has a meter malfunction exemption should the NMI be automatically 'resolved' from the exemption? Any exemption will have been requested because a) the MC can't do it in the required timeframe, or b) required customer to resolve defect before the meter can be installed. Successful installation of the meter means both of these have been negotiated which means the exemption has been resolved. This will streamline the process. Is this worth consideration?</li> </ul>	
66	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	Yurika Metering	Yurika Metering is supportive of this change. However, Yurika Metering questions whether the obligation on the Metering Coordinator (MC) to notify participants within 1BD of the granting of an exemption per clause 2.8(b) is still relevant due to Market Settlement and Transfer Solutions (MSATS) providing a notification to participants via the Change Request (CR) notification process following the completion of the CR5101.	AEMO notes the respondent's comment and refers to the response in table 2, item 58.



No.	Section	Description	Stakeholder	Participant comments	AEMO response
67	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	Alinta Energy	understood	AEMO notes the respondent's comment.
68	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	CitiPower Powercor	No comment	
69	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
70	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	Origin Metering Coordinator	<p>Will MCs be notified of all NMI's which have had their statuses updated to "CLOSED"?</p> <p>Are there two different statuses: CLOSED vs EXPIRED? (Should there be?)</p>	<p>AEMO notes that MCs have access to the MSATS portal and can check the portal for updates to the exemption, and they will also receive notifications for any NMIs that have expired.</p> <p>AEMO clarifies that Closed means Expired and will update the procedure to only contain Expired status to eliminate confusion.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
71	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	PLUS ES	PLUS ES suggests that the additional paragraph with respect to closed status is removed from the procedure. It is information which belongs in the Metering Installation Exemption Guideline as it refers to the automated process.	AEMO notes that the additional paragraph needs to remain for clarification and that the procedure will be updated to replace Closed status with Expired Status to eliminate confusion.
72	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	United Energy	No comment	
73	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
74	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	Alinta Energy	understood	AEMO notes the respondent's comment.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
75	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	CitiPower Powercor	No comment	
76	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
77	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	Origin Metering Coordinator	No comments	
78	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	PLUS ES	PLUS ES recommends that the additional section is removed from the procedure and made available in the Metering Installation Exemption Guideline as it refers to the automated process (the solution rather than the procedure).	AEMO notes that the additional section needs to remain for clarification.
79	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	United Energy	No comment	
80	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
81	2.11 Revocation of Exemption		Intellihub	Clause 2.11: Notification of when an exemption is revoked will now be achieved via the automation process and affected Participants will be notified from MSATS. We suggest this clause be reworded to:	AEMO notes that the obligations in the procedures need to remain and cannot be changed because of the automation, the automation may provide a solution to

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				If the Current MC fails to meet any condition of the exemption specified by AEMO, or any of the conditions specified in section 2.8, AEMO may revoke the exemption, notify the Current MC of the revocation and update MSATS.	participants to achieve their obligation, however the obligation needs to remain.
82	2.11 Revocation of Exemption		PLUS ES	<p>PLUS ES recommends modifying the clause to reflect the metering installation exemption automation process and its benefits by deleting the last part of the section ...whereupon the Current MC must notify all affected Participants of the revocation within one business day.</p> <p>Whilst not clear in the Metering Installation Exemption Guideline, one assumes AEMO would change the exemption status from active to a status to reflect the revocation of the exemption. This would trigger the details to be removed from MSATS. The MSATS update and the CR notification to affected participant will satisfy this condition.</p>	AEMO notes the respondent's comment and refers to the response in table 2, item 81.
83	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	Alinta Energy	understood	AEMO notes the respondent's comment.
84	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	CitiPower Powercor	No comment	
85	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	Intellihub	Clause 3.1.ii: We disagree with adding this additional obligation on MCs to provide a MDP action plan for HV and LV CT sites. We believe that this additional obligation is adding additional administrative responsibility for minimal benefit because MDPs are	<p>AEMO notes that this is not an additional obligation. Current Exemption Procedure requires:</p> <ul style="list-style-type: none"> <li>• Details of instructions given to MP and MDP related to the rectification of a</li> </ul>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				accredited participants who are obligated to comply with the metrology procedures for substitutions and are regularly audited. In addition, impacted participants have the right to request the MDP to change the substitution if they believe the substitution is not appropriate for a NMI. We also note that the NER does not require a MDP action plan for an exemption. We suggest that clause 3.1.ii be removed.	<p>metering installation malfunction (ref. Appendix A Item 10), and</p> <ul style="list-style-type: none"> <li>• Details of how the provision of metering data will be addressed (ref. Appendix B Item 11)</li> </ul> <p>This requirement provides assurance for AEMO that relevant methodologies will be used to facilitate energy market settlements.</p>
86	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	Origin Metering Coordinator	<p>(Could rectification plans be submitted as part of the application on type 4/5/6 replacements?)</p> <p>When a type 5/6 meter is faulty and requires replacement, would there still be a need for a rectification plan from the current MP? The Pending MP, does not yet have a relationship with this site until such time that their meter is installed. Noting there is no need to provide a rectification plan on Type 5/6 as they can only be replaced by a COMMS meter.</p>	AEMO notes that MP Rectification plans will still be required for all exemptions as per the rules.
87	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	PLUS ES	<p>PLUS ES understands the potential reasoning of the inclusion but question what additional value this would deliver, that is not provided today via current obligations and market requirements.</p> <ul style="list-style-type: none"> <li>• The MDP's actions are governed by the MDP SLP and Metrology Part B procedures.</li> <li>• The information is communicated in the daily NEM 12/13 files.</li> <li>• In MC churn scenarios the MC may not have a relationship with the MDP as in the case of legacy metering.</li> <li>• There is no reciprocal NER obligation.</li> </ul> <p>PLUS ES believes that the inclusion increases administrative effort for both the MC and the AEMO resources, for no additional value to the market and</p>	AEMO notes the respondent's comment and refers to the response in table 2, item 85.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				hence suggest the MDP action plan clause should be removed.	
88	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	United Energy	No comment	
89	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	Vector Metering	<ul style="list-style-type: none"> <li>MP rectification plan – the new process requires the MP rectification plan to be provided as a prerequisite to AEMO approving a Malfunction exemption however the rules do not require this. NER 7.8.10 say “If an exemption is provided by AEMO under this clause 7.8.10 then the Metering Provider must provide AEMO with a plan for the rectification of the metering installation.”. This is supported by 3.1.(i). It is unclear why AEis requiring this as part of its determination. Please advise.</li> <li>Clause 3.1(ii) should make clear that a MDP rectification plan not required for a Whole Current meter. (See below)</li> </ul>	<p>AEMO notes that the obligation to provide the MP rectification plan has not changed due to the automation.</p> <p>Regarding clause 3.1(ii), AEMO notes that it only mentions HV and LV CT sites and does not refer to whole current meters.</p>
90	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	Yurika Metering	Yurika Metering is supportive of this change.	
91	3.2 Contents	Added a new section on the MDP action plan	Alinta Energy	understood	AEMO notes the respondent’s comment.
92	3.2 Contents	Added a new section on the MDP action plan	CitiPower Powercor	CitiPower Powercor supports the MDP action plan.	AEMO notes the respondent’s agreement with the proposed change.
93	3.2 Contents	Added a new section on the MDP action plan	Intellihub	Clause 3.2.2: We disagree with adding this additional obligation on MCs to provide a MDP action plan for HV and LV CT sites. We believe that this additional obligation is adding additional administrative responsibility for minimal benefit because MDPs are	AEMO notes the respondent’s comment and refers to the response in table 2, item 85.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				accredited participants who are obligated to comply with the Metrology Procedures for substitutions and are regularly audited. In addition, impacted participants have the right to request the MDP to change the substitution if they believe the substitution is not appropriate for a NMI. We also note that the NER does not require a MDP action plan for an exemption. We suggest that clause 3.2.2 be removed.	
94	3.2 Contents	Added a new section on the MDP action plan	Origin Metering Coordinator	No comments	
95	3.2 Contents	Added a new section on the MDP action plan	PLUS ES	<p>PLUS ES believes that the inclusion increases administrative effort for no additional value to the market and hence suggest the MDP action plan clause should be removed.</p> <ul style="list-style-type: none"> <li>• The MDP's actions are governed by the MDP SLP and Metrology Part B procedures.</li> <li>• The substitution/estimation information requested in the MDP action plan is available and communicated in the daily NEM 12/13 files.</li> <li>• Not all malfunctioning metering installations require data to be substituted.</li> <li>• In MC churn scenarios the MC may not have a relationship with the MDP as in the case of legacy metering.</li> <li>• There is no reciprocal NER obligation.</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 2, item 85.
96	3.2 Contents	Added a new section on the MDP action plan	United Energy	United Energy supports the MDP action plan.	AEMO notes the respondent's agreement with the proposed change.
97	3.2 Contents	Added a new section on the MDP action plan	Vector Metering	<ul style="list-style-type: none"> <li>• MDP rectification plan – a MDP rectification plan is not required under the rules therefore we don't agree with its inclusion.</li> <li>• The majority of these types of malfunctions exemptions are raised on sites with legacy metering which means the DNSP remains in the metering roles until the meter is exchanged. The</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 2, item 85.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>contestable MC does not have a relationship with the legacy MDP (DNSP) to require them to provide a rectification plan. We note that MDP's already provide most of the information proposed in the procedure. MDP's are required to provide the substitution method and reason in the NEM12/NEM13 file when it creates the substitute reads. The MDP will not be able to provide any information on the period for which subs will be provided as they do not control the scheduling of the repair. This is the job of the MC and New MP (who is not yet in the role of MP).</p> <ul style="list-style-type: none"> <li>For these reasons we do not support the inclusion of the MDP rectification plan.</li> </ul>	
98	3.2 Contents	Added a new section on the MDP action plan	Yurika Metering	Yurika Metering is supportive of this change. However, as this is a new requirement, MC's will need to work with their Metering Providers and Metering Data Providers (MDP) to ensure these participants have processes to determine data impacts and substitution requirements prior to the MC completing the exemption request. This will allow the required supporting documentation (MP Rectification Plan and MDP Action Plan) to be provided to AEMO via email within the required timeframes.	AEMO notes the respondent's support of the proposed change and refers to the response in table 2, item 85.
99	Appendix A. Application for Exemption	Deleted Appendix A	Alinta Energy	understood	AEMO notes the respondent's comment.
100	Appendix A. Application for Exemption	Deleted Appendix A	CitiPower Powercor	No comment	
101	Appendix A. Application for Exemption	Deleted Appendix A	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.



No.	Section	Description	Stakeholder	Participant comments	AEMO response
102	Appendix A. Application for Exemption	Deleted Appendix A	Origin Metering Coordinator	No comments	
103	Appendix A. Application for Exemption	Deleted Appendix A	United Energy	No comment	
104	Appendix A. Application for Exemption	Deleted Appendix A	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
105	Appendix B. Application for Extension	Deleted Appendix B	Alinta Energy	understood	AEMO notes the respondent's comment.
106	Appendix B. Application for Extension	Deleted Appendix B	CitiPower Powercor	No comment	
107	Appendix B. Application for Extension	Deleted Appendix B	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
108	Appendix B. Application for Extension	Deleted Appendix B	Origin Metering Coordinator	No comments	
109	Appendix B. Application for Extension	Deleted Appendix B	United Energy	No comment	
110	Appendix B. Application for Extension	Deleted Appendix B	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.

**Table 3 Metering Exemption (Small Customer Metering Installation)**

No.	Section	Description	Stakeholder	Participant comments	AEMO response
1	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Alinta Energy	N/A	
2	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	AusNet	<p>In 2017, the Victorian Government chose to extend indefinitely its AMI Mandate for the exclusive provision of small customer metering at “relevant metering installations” within the state of Victoria (that previously existed under a NER Chapter 9 Derogation) through specific changes to the NER legislation in Victoria through a series of gazetted Orders-in-Council.</p> <p>Under those OiC’s issued by the Victorian Government, the Victorian NER Chapter 7 specifically exclude the requirements of 7.8.3 and 7.8.4 in relation to the LNSP “relevant metering installations” (i.e. AMI Metering) within Victoria.</p> <p>Modification of new Chapter 7 – Clauses 7.8.3 and 7.8.4 disappplied in respect of relevant metering installations:</p> <p>1. After clause 7.8.3(c) insert: ‘(d) This clause 7.8.3 does not apply in Victoria in respect of relevant metering installations.’</p>	AEMO notes that VIC DBs have different framework for VIC AMI meters and clarifies that the metering installation exemption guideline contains instructions on how to apply for and manage exemptions and it does not place any obligations on participants to apply for exemptions or not.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>2. After clause 7.8.4(i) insert: '(j) This clause 7.8.4 does not apply in Victoria in respect of relevant metering installations.'</p> <p>Therefore, AusNet considers that AEMO Small Customer Exemption requirements do not apply to the Victorian Distributor's "relevant metering installations" i.e. Victorian AMI Metering. This exclusion should be written into the meter exemption guideline.</p>	
3	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	CitiPower Powercor	<p>CitiPower Powercor comments below reference Section 1.1:</p> <p>In 2017 in response to the introduction of the Power of Choice Metering Competition Rule change, the Victorian Government chose to extend indefinitely its AMI Mandate for the exclusive provision of small customer metering at "relevant metering installations" within the state of Victoria (that previously existed under a NER Chapter 9 Derogation) through specific changes to the NER legislation in Victoria through a series of gazetted Orders-in-Council.</p> <p>Under those OiC's issued by the Victorian Government, the Victorian NER Chapter 7 specifically exclude the requirements of 7.8.3 and 7.8.4 in relation to the LNSP "relevant metering installations" (i.e. AMI Metering) within Victoria.</p>	AEMO notes the respondent's comment and refers to the response in table 3, item 2.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>Modification of new Chapter 7 – Clauses 7.8.3 and 7.8.4 disappplied in respect of relevant metering installations:</p> <ol style="list-style-type: none"> <li>1. After clause 7.8.3(c) insert: '(d) This clause 7.8.3 does not apply in Victoria in respect of relevant metering installations.'</li> <li>2. After clause 7.8.4(i) insert: '(j) This clause 7.8.4 does not apply in Victoria in respect of relevant metering installations.'</li> </ol> <p>Consequently it is CitiPower Powercor's view that AEMO Small Customer Exemption requirements also do not apply to the Victorian Distributor's "relevant metering installations" i.e. Victorian AMI Metering.</p>	
4	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
5	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Origin Metering Coordinator	No comments	
6	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with	PLUS ES	Typo – in conjunction requires a space after in.	AEMO agrees with the respondent's comment and will make the correction to the procedure.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		the new Metering Exemption Guideline			
7	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	United Energy	<p>United Energy comments below reference Section 1.1:</p> <p>In 2017 in response to the introduction of the Power of Choice Metering Competition Rule change, the Victorian Government chose to extend indefinitely its AMI Mandate for the exclusive provision of small customer metering at “relevant metering installations” within the state of Victoria (that previously existed under a NER Chapter 9 Derogation) through specific changes to the NER legislation in Victoria through a series of gazetted Orders-in-Council.</p> <p>Under those OiC’s issued by the Victorian Government, the Victorian NER Chapter 7 specifically exclude the requirements of 7.8.3 and 7.8.4 in relation to the LNSP “relevant metering installations” (i.e. AMI Metering) within Victoria.</p> <p>Modification of new Chapter 7 – Clauses 7.8.3 and 7.8.4 disappplied in respect of relevant metering installations:</p> <ol style="list-style-type: none"> <li>1 After clause 7.8.3(c) insert: ‘(d) This clause 7.8.3 does not apply in Victoria in respect of relevant metering installations.’</li> <li>2 After clause 7.8.4(i) insert: ‘(j) This clause 7.8.4 does not apply in Victoria in respect of relevant metering installations.’.</li> </ol> <p>Consequently it is United Energy’s view that AEMO Small Customer Exemption requirements also do not apply to the Victorian Distributor’s “relevant metering installations” i.e. Victorian AMI Metering.</p>	AEMO notes the respondent’s comment and refers to the response in table 3, item 2.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
8	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's support of the proposed change.
9	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	Alinta Energy	N/A	
10	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	CitiPower Powercor	No comment	
11	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
12	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	Origin Metering Coordinator	<p>"at least 15 days prior" would mean one can submit an application 3 months prior.</p> <p>Will the system allow us to submit an exemption on a currently OPEN exemption? Our understanding is that the system will have validation to prevent participants to apply on existing Open exempted NMIs.</p>	AEMO notes that a NMI can only be active in one exemption at a time, and that open exemption application will need to be cancelled and a new application will need to be lodged prior to the expiry date.
13	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	United Energy	No comment	
14	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
15	2.2.2 Expiry		PLUS ES	PLUS ES recommends that clause (b) is amended to ensure consistent remote acquisition is established. (Where consistent needs to be defined).	AEMO notes that this is out of scope for this consultation and suggests that the participant raise an ICF for this through the ERCF.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
16	3.2 Form of Application	Updated section to reflect the new automated exemption process	Alinta Energy	N/A	
17	3.2 Form of Application	Updated section to reflect the new automated exemption process	CitiPower Powercor	No comment	
18	3.2 Form of Application	Updated section to reflect the new automated exemption process	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
19	3.2 Form of Application	Updated section to reflect the new automated exemption process	Origin Metering Coordinator	No comments	
20	3.2 Form of Application	Updated section to reflect the new automated exemption process	United Energy	No comment	
21	3.2 Form of Application	Updated section to reflect the new automated exemption process	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
22	3.4 Timing of Application		PLUS ES	<p>PLUS ES recommends a review of the clause and appropriate modifications made to capture most use cases in which the MC may be required and can apply for an exemption.</p> <ul style="list-style-type: none"> <li>No later than 30 bus days post metering installation – whilst in most cases this may be efficient, there are use cases where 30</li> </ul>	AEMO notes that this is out of scope for this consultation and suggests that the participant raise an ICF for this through the ERCF.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>bus days is not sufficient timeframe for the MP to exhaust all remedies to establish remote communications. Examples of use cases where remote acquisition capability remediation may exceed 30 bus days: access issues, permissions from strata groups, sourcing of equipment etc.</p> <p>For the MC and AEMO's efficiencies, PLUS ES recommends the timeframe is extended to 60 business days. Especially as MC and MDP obligations/practices have evolved since these procedures were implemented.</p> <ul style="list-style-type: none"> <li>The current scope and wording do not support an exemption application where an established remote communicating metering installation ceases to communicate due to environmental or physical conditions post 30 business days after installation, such as the telecommunications service provider relocating their infrastructure and creating a dead zone.</li> </ul>	
23	3.4 Timing of Application		Vector Metering	<ul style="list-style-type: none"> <li>It is our view that current provisions under 3.4 that limit the MC to being able to apply for a Type4a exemption for no communications unless the application is made within 30 business days from the meter installation date is not reflective of the reality of communications issues experienced by the market and is leading to confusion amongst market participants. Meters for which no communications can be established, or have lost communications after installation that cannot be restored, are for all intents and purposes are a Type 4a meter but remain labelled as communication smart meter (e.g. COMMS4D). Because the meter is labelled as Communicating (Meter Installation Type Code) Participant reasonably expect that remote services are available when in fact they are not.</li> </ul>	AEMO notes that this is out of scope for this consultation and suggests that the participant raise an ICF for this through the ERCF.



No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>Retailers are requesting remote DEEN and REEN's, and other services that cannot be provided. Likewise, Meter Data Providers are being requested by DNSPs and Retailers to provide daily actual meter reads when this data is only collected on a manual read cycle (at least once every 3 months). . If the meter was clearly identified as a non-communicating type4a meter (MRAM) then participants can determine that remote services are not available, and data will be provided on a frequency other than daily.</p> <ul style="list-style-type: none"> <li>• It is not uncommon for communications to be lost at a communicating meter after its commissioning. This often occurs because infrastructure is built around the metering position that block the telco signal. This is common in new multi occupancies. To remedy this the MP needs to attend site to determine the cause of the loss of signal, determine an appropriate solution which often requires the customer to make changes to allow the MP to install additional equipment, for example conduits to allow for extended aerial cables. To arrange this can take many months before communications can be restored.</li> <li>• For newly installed meters it often takes multiple visits to the site and multiple teams before all avenues to establish communications has been exhausted. This often takes longer than the 30 business days currently permitted by the procedure.</li> <li>• There have been instances where the only telco in the area has reconfigured their services causing a loss of signal to NMI's in the local area. This takes some time to identify, usually after all other remedies have been attempted and failed. In these cases, getting the Telco to reverse their changes is not assured and these NMI's may remain without communications for the foreseeable future.</li> </ul>	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<ul style="list-style-type: none"> <li>We understand that MC's do have a 'work around' available which would be to simply replace the previously installed smart meter with a new one, thus resetting the date of installation, then apply for the type4a exemption within 30 business days. While this would meet the requirements of the procedures, we believe this is wasteful, would contribute to a higher cost for metering and is an example of regulation creating perverse outcomes.</li> </ul>	
24	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	Alinta Energy	N/A	
25	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	CitiPower Powercor	No comment	
26	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
27	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	Origin Metering Coordinator	No comments	
28	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	PLUS ES	<p>Clause (c):</p> <p>PLUS ES recommends that the additional information should be in the Metering Installation Exemption Guideline as it is pertinent to the solution and not the procedure.</p>	AEMO notes that the obligations need to remain in the procedures. AEMO agrees with the suggested status update and will amend the procedure accordingly.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				Additionally, the included paragraph mentions a status of More Data, but the Metering Installation Exemption Guideline notes a status code of More Info. We recommend an alignment of the stated status and the automated process available codes.	
29	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	United Energy	No comment	
30	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	Yurika Metering	Yurika Metering is supportive of this change. However, we seek clarification as to how the confirmation of receipt, as outlined in clause 3.5(b), will be provided to the MC.	AEMO notes that once an exemption application is submitted through the MSATS portal, an exemption application number will be generated as a confirmation of receipt.
31	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Alinta Energy	N/A	
32	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	CitiPower Powercor	No comment	
33	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
34	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Origin Metering Coordinator	No comments	
35	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	PLUS ES	PLUS ES recommends: <ul style="list-style-type: none"> <li>Clause (b) be modified so that the commencement exemption date is the 'Date first aware of the issue'. This</li> </ul>	AEMO notes this is an existing obligation and has not changed because of the automation, however clarification has been added in relation

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>information is requested in the application form and should be used. Any date other than the metering installation date or the 'Date first aware of the issue' leaves the MC exposed to non-compliance, especially with conditional administrative requirements such as receipt of supporting documentation.</p> <ul style="list-style-type: none"> <li>• The conjunction between clause (a) and (b) to be amended from 'and' to 'or' as only one date can apply.</li> <li>• Commencement dates to be succinctly defined: for example, the definition of ..whichever is the greater, is left to open to interpretation.</li> </ul>	to the automated application process in MSATS Portal. An ICF may be raised through ERCF if participants wish to amend the clause.
36	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	United Energy	No comment	
37	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Vector Metering	<p>We believe the exemptions data should begin on the date that the application request specifies.</p> <p>Clause (b) Indicates that any exemption would start on the later date of when the supplementary documentation (such as the rectifications plans) is supplied. As the new process is now two step and MC's have to wait until AEMO provides the Exemption ID, which we assume to be up to 5 days to provide (this procedure does not specify how long AEMO has but we assume it will be the same as documented in the Cl. 2.3 of the Exemption Procedure (Metering Installation Malfunctions) )</p>	<p>AEMO notes the respondent's comment and refers to the response in table 3, item 35.</p> <p>AEMO notes that an application exemption ID will be provided on the MSATS Portal to the participant once the application is submitted.</p>
38	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
39	3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	Alinta Energy	N/A	
40	3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	CitiPower Powercor	No comment	
41	3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
42	3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	Origin Metering Coordinator	No comments	
43	3.7 Current MC's Obligations during the Exemption Period	Clause (a)	PLUS ES	<p>PLUS ES questions the value/validity of this clause with the new automated process.</p> <p>The MC will become aware of the telecommunications network enabling remote access when their metering installation starts communicating. The MC would then update the status of the exemption as resolved irrespective of the timeline of the exemption period. Additionally update the Meter Type Installation from MRAM to Comms 4X. AEMO has access to the output/information of both activities.</p> <p>PLUS ES recommends for efficiency the clause it deleted.</p>	AEMO notes that this is out of scope for this consultation and suggests that the participant raise an ICF for this through the ERCF.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
44	3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	PLUS ES	<p>PLUS ES requests clarification with respect to clause (b) (there is no clause (c)) and section 2.2.1 second paragraph which refers to requiring an exemption period greater than the current exemption period.</p> <p>Section 2.2.1 requires the MC to submit all paperwork 15 business days prior to the expiry date and section 3.7 Clause (b) calls for an application of a new exemption of a minimum of 30 business days.</p> <p>PLUS ES recommends a standardisation of timeframes between the two clauses. Especially, the intent is to submit a new application to gain an additional exemption period.</p>	AEMO agrees there is no clause (c) and agrees to align the timeframes between section 2.2.1 and clause 3.7(b) to both be 30 business days, the procedure will be amended accordingly.
45	3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	United Energy	No comment	
46	3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	Yurika Metering	Yurika Metering notes that there is no clause 3.7(c) referenced in the draft procedure.	AEMO agrees there is no clause (c) in the draft procedure
47	4.1 Exemption Personal to Metering Co-ordinator		PLUS ES	<p>PLUS ES suggests adding clarification that says the Exemption for a metering installation following an MC churn will be closed and the new MC will be required to submit a new application if the exemption is still required within X business days. The effective date of the exemption will be the date of the MC churn date.</p> <p>If the proposed is applied section 4.2 is no longer required and can be deleted.</p>	AEMO notes that section 4.1 is stating the condition and then section 4.2 describes the process of sharing the exemption information, hence it is clearer to leave the sections as is.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
48	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	Alinta Energy	N/A	
49	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	CitiPower Powercor	No comment	
50	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	Intellihub	<p>Clause 4.2.a: We believe that AEMO will have better visibility of a change to the MC where an exemption was granted with the implementation of this new automation. Therefore, the obligation on the MC to notify AEMO of a new MC is now redundant and we suggest that this clause be removed.</p> <p>Clause 4.2.b: Could AEMO please confirm if an exemption approved under this procedure will result in an update to MSATS? If no, then the MC will not have visibility on whether there is an exemption granted as per this procedure. Therefore, we suggest AEMO considers updating MSATS for exemptions approved under this procedure or create a new SDQ report that informs an MC who recently became the MC for a NMI that has an exemption approved under this procedure.</p> <p>Clause 4.2.b: We suggest that the timeframe be extended from 5 business days to 10 business days. We agree with AEMO that the volume of exemptions getting raised warrants all parties involved in the process be afforded additional time for manual steps, which would include the obligations defined in this clause.</p>	<p>Clause 4.2.a: AEMO notes that the clause cannot be removed as the procedure still needs to include the relevant obligations. The exemption automation is a solution and does not remove the obligations.</p> <p>Clause 4.2.b: AEMO notes that if an exemption is approved its status will be updated in the MSATS Portal where MCs can check the status. AEMO notes that a new SDQ report is out of scope for this consultation and suggests participant to raise and ICF through ERCF.</p> <p>Regarding extending the timeframe, AEMO notes that the current timeframes are sufficient for the process.</p>
51	4.2 Application for Exemption if No	Updated section to reflect the new	Origin Metering Coordinator	No comments	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
	Change in Circumstances	automated exemption process			
52	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process  Clause (a)	PLUS ES	PLUS ES recommends that this clause is deleted, supported by the following reasoning: <ul style="list-style-type: none"> <li>AEMO according to the Metering Installation Exemption Guideline will be providing a SDQ check for Meter Exemption MC Churns – so there is no additional value for the MC to continue with this obligation, as AEMO is aware of the MC churn.</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 3, item 50.
53	4.2 Application for Exemption if No Change in Circumstances	Clause (b)	PLUS ES	PLUS ES has the following comments: <ul style="list-style-type: none"> <li>How the new MC will know an exemption has been approved and need to continue with the exemption for a metering installation, since the information will not be available in MSATS for the no network coverage exemptions.</li> <li>This notification could be provided to the new MC via the ME MC Churn SDQ check</li> <li>In some cases, a metering installation which was required to be exempt for one MC may not be a requirement for another. 5 bus days is not sufficient for an MC to determine to submit an exemption especially if the MC decides to churn the metering provider.</li> <li>The value of providing a statutory declaration especially when the new MC needs to submit a new exemption application and the MP has not changed.</li> </ul> <p>For the reasons above and the feedback we provided against section 4.1, PLUS ES recommends the clause is removed.</p>	AEMO notes that the obligations in this clause has not changed, however the clause has been amended to replace the manual exemption application forms with the automated MSATS portal application. Exemption applications will be available in the MSATS portal.  Regarding extending the timeframe, AEMO notes that the current timeframes are sufficient for the process.
54	4.2 Application for Exemption if No	Updated section to reflect the new	United Energy	No comment	



No.	Section	Description	Stakeholder	Participant comments	AEMO response
	Change in Circumstances	automated exemption process			
55	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	Vector Metering	<ul style="list-style-type: none"> <li>Unclear why the MC must notify AEMO when it is the AEMO system that notifies the MC of a change in MC. This is inefficient. AEMO should have a report that provides this.</li> <li>It is also unclear how the New MC will know that a NMI it has been assigned is part of an existing exemption list raised by the old MC. The Guide makes reference to the change of status to MCCHURN but it is unclear if the New MC can view the details of the exemption raised by the old MC. Given the MC has only 5 business days to lodge for a continuation then MC's should be pushed a notification where the exemption exists. Email would do, alternately push the MCCHURN report daily.</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 3, item 53.
56	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
57	4.3 Change in Circumstances	Deleted reference to Appendix A	Alinta Energy	N/A	
58	4.3 Change in Circumstances	Deleted reference to Appendix A	CitiPower Powercor	No comment	
59	4.3 Change in Circumstances	Deleted reference to Appendix A	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
60	4.3 Change in Circumstances	Deleted reference to Appendix A	Origin Metering Coordinator	No comments	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
61	4.3 Change in Circumstances	Deleted reference to Appendix A	PLUS ES	PLUS ES suggests either rewording the section for succinctness and intent or removing it entirely. The confusion comes from the undefined change in circumstances and the conditional requirement of the New MC applying for an exemption. There could be a change of circumstances and the MC is the current MC as per our feedback in section 3.4.	AEMO notes that this is out of scope for this consultation and suggests that the participant raise an ICF for this through the ERCF.
62	4.3 Change in Circumstances	Deleted reference to Appendix A	United Energy	No comment	
63	4.3 Change in Circumstances	Deleted reference to Appendix A	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.
64	Appendix A. Application for Exemption	Deleted Appendix A	Alinta Energy	N/A	
65	Appendix A. Application for Exemption	Deleted Appendix A	CitiPower Powercor	No comment	
66	Appendix A. Application for Exemption	Deleted Appendix A	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
67	Appendix A. Application for Exemption	Deleted Appendix A	Origin Metering Coordinator	No comments	
68	Appendix A. Application for Exemption	Deleted Appendix A	United Energy	No comment	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
69	Appendix A. Application for Exemption	Deleted Appendix A	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.

**Table 4 Metering Installation Exemption Guideline (New Document)**

No.	Section	Stakeholder	Participant comments	AEMO response
1	General Comment	Vector Metering	Until all the issue raised in the procedures are dealt with it is difficult to finalise this guideline. A further review will be required.	AEMO notes the respondent's comment.
2	1.1	PLUS ES	The Guideline supplements the Metering NEM Exemption Procedure. PLUS ES recommends either naming the individual Procedures or amending the word Procedure to Procedures – to maintain generic referencing and indicate there is more than one Procedure.	AEMO agrees with the respondent's comment and will amend the guideline.
3	3. Application process	Intellihub	Clause 3: We believe the reference to clause 7.8.3(a) of the NER is not appropriate and suggest that this be replaced with 7.8.10(a).	AEMO agrees with the respondent's comment and will amend the guideline.
4	3.1 Generally	Alinta Energy	N/A	
5	3.1 Generally	CitiPower Powercor	No comment	
6	3.1 Generally	Intellihub	None.	
7	3.1 Generally	Origin Metering Coordinator	No comments	
8	3.1 Generally	United Energy	No comment	
9	3.1 Generally	Yurika Metering	Yurika Metering provides no comment.	

No.	Section	Stakeholder	Participant comments	AEMO response
10	3.2 Responsibility	Alinta Energy	N/A	
11	3.2 Responsibility	CitiPower Powercor	No comment	
12	3.2 Responsibility	Intellihub	None.	
13	3.2 Responsibility	Origin Metering Coordinator	No comments	
14	3.2 Responsibility	United Energy	No comment	
15	3.2 Responsibility	Yurika Metering	Yurika Metering provides no comment.	
16	3.3 Supporting Information to support Application	Alinta Energy	N/A	
17	3.3 Supporting Information to support Application	CitiPower Powercor	No comment	
18	3.3 Supporting Information to support Application	Intellihub	None.	
19	3.3 Supporting Information to support Application	Origin Metering Coordinator	No comments	
20	3.3 Supporting Information to support Application	PLUS ES	<p>PLUS ES recommends the following amendments for clarity:</p> <ul style="list-style-type: none"> <li>• ...once raised and when required, the Current MC must provide via email supporting information ...</li> </ul>	AEMO agrees with the respondent's comment and will amend the guideline.

No.	Section	Stakeholder	Participant comments	AEMO response
21	3.3 Supporting Information to support Application	United Energy	No comment	
22	3.3 Supporting Information to support Application	Yurika Metering	Yurika Metering seeks clarification whether the allocated Exemption number will be visible to the MC upon entering the exemption application via MSATS, or if it will be provided/sent to the MC following completion of the application.	AEMO notes that the Exemption number will be created and visible once the application is submitted via the MSATS Portal.
23	Two step process	PLUS ES	<p>PLUS ES has concern that this proposed process now adds additional process steps from the MCs perspective. Where it is currently one email including all the supporting documentation required, now the MC needs to raise the request in MSATS and then wait for an exemption ID to trigger an email with supporting information.</p> <p>It also potentially requires AEMO staff to consolidate the online application with emails to complete the assessment.</p> <p>We recommend that AEMO reviews the automated solution and propose a more efficient process to allow participants to complete and manage exemption applications via the one mechanism.</p>	AEMO notes that the current MSATS functionality doesn't support the uploading and managing of external documents.
24	4. Creation and Management of an Application			
25	4.1 Exemption life cycle	Alinta Energy	N/A	
26	4.1 Exemption life cycle	CitiPower Powercor	No comment	
27	4.1 Exemption life cycle	Intellihub	None.	
28	4.1 Exemption life cycle	Origin Metering Coordinator	No comments	

No.	Section	Stakeholder	Participant comments	AEMO response
29	4.1 Exemption life cycle	United Energy	No comment	
30	4.1 Exemption life cycle	Yurika Metering	Yurika Metering provides no comment.	
31	4.2 Navigation to exemptions	Alinta Energy	N/A	
32	4.2 Navigation to exemptions	CitiPower Powercor	No comment	
33	4.2 Navigation to exemptions	Intellihub	None.	
34	4.2 Navigation to exemptions	Origin Metering Coordinator	No comments	
35	4.2 Navigation to exemptions	United Energy	No comment	
36	4.2 Navigation to exemptions	Yurika Metering	Yurika Metering seeks further information whether access to the Meter Exemptions function in MSATS/Markets Portal will be via existing MSATS access (MC Login), or if AEMO will provide new logins to participants.	AEMO notes that the MC will use their current login but will have new access rights for the exemption's functionality in the MSATS portal.
37	4.3 Exemption list	Alinta Energy	N/A	
38	4.3 Exemption list	CitiPower Powercor	No comment	
39	4.3 Exemption list	Intellihub	We suggest that Exemption Category, Exemption Type and Nature of Exemption be part of the search criteria	AEMO notes that this is out of scope for this consultation as the system functionality has already been built. AEMO suggests that the participant raise an ICF for this through the ERCF.

No.	Section	Stakeholder	Participant comments	AEMO response
40	4.3 Exemption list	Origin Metering Coordinator	No comments	
41	4.3 Exemption list	PLUS ES	<ul style="list-style-type: none"> <li>PLUS ES has not been able to determine if entering the NMI in the NMI search parameter will return the status of the NMI or the exemption ID which contains the NMI.</li> </ul> <p>The MC must have the ability to view single NMI status in the Exemption Window. That is, not required to drill into the exemption ID and download a CSV list of potential numerous NMIs associated with an individual Exemption ID.</p> <ul style="list-style-type: none"> <li>PLUS ES supports that the ability to identify the exemption type in the exemption window will be extremely beneficial to the MC in managing their exemptions. i.e. being able to tell if it is a malfunction vs Type 4a exemption.</li> </ul>	AEMO notes that a NMI can be entered in the search parameter, this will bring all the exemptions that the NMI is associated with, then once an exemption is selected, the NMI can be searched for in that exemption.
42	4.3 Exemption list	United Energy	No comment	
43	4.3 Exemption list	Yurika Metering	Yurika Metering provides no comment.	
44	4.4 Creating a new exemption	Alinta Energy	N/A	
45	4.4 Creating a new exemption	CitiPower Powercor	No comment	
46	4.4 Creating a new exemption	Origin Metering Coordinator	No comments	
47	4.4 Creating a new exemption	PLUS ES	<p>PLUS ES recommends that a definition of the Comments Action Reason section is required to inform the user how this section is to be used and who will be using it.</p> <p>We also seek clarification at what stage will the exemption ID number be visible to the user. We are assuming that creating an exemption also creates the exemption ID. Hence we recommend that it is clarified in the paragraph: On completion of populating ...</p>	AEMO notes that the Comments Action reason section is for MC to provide notes on why they took the action. An example, if the MC cancels an Exemption, they may want to add a note, or if the MC wants an extension they should include why they need an extension and the actions they have taken to resolve the exemptions prior to the extension being

No.	Section	Stakeholder	Participant comments	AEMO response
				<p>granted. AEMO will add this clarification the guideline.</p> <p>AEMO agrees with the respondent's comment regarding the exemption ID and will amend the guideline to clarify.</p>
48	4.4.1	PLUS ES	<p>Substitution Required Field:</p> <p>PLUS ES is seeking clarification on the requirements in populating the field.</p> <ul style="list-style-type: none"> <li>This field has been identified as Mandatory. What if the detail is not available? That is, what if meter does not belong to a MP/MDP which has a commercial arrangement with the MC (scenarios of MC churn).</li> <li>The screen shot for diagram 5 show that the field is a 'check' box format. How is a mandatory field managed via a single check box?</li> <li>It is not clear what the intent of footnote (3) is (against the Substitution Required field).</li> </ul>	<p>AEMO notes the respondent's comment and will reword the section to avoid confusion and delete rules references as it is not relevant in the footnotes of the guideline.</p>
49	4.4.1	PLUS ES	<p><b>NMI Validation: NMI is included in another active exemption ID.</b></p> <p>PLUS ES has concerns this validation will constrain the MC's ability to raise exemptions as required.</p> <p>Use case: the MC has raised an exemption against a NMI which has a CT and VT. The exemption has been raised because the CT has failed. Before the Malfunction can be resolved the VT malfunctions. According to the validation the MC will not be able to raise an exemption for the VT component as the system will reject it. Whilst these occurrences are few they still exist and will create a break point in the process.</p>	<p>AEMO notes that the exemption covers the whole metering installation regardless of the component that failed, as a result there is no need to raise two exemptions for the same metering installation if the issues will be fixed in the same timeframe.</p>
50	4.4.2	PLUS ES	<p>Footnote 4: see PLUS ES comments with respect to the Twostep process.</p>	<p>AEMO notes the respondent's comment and refers to the response in table 4, item 24.</p>
51	4.4 Creating a new exemption	United Energy	<p>No comment</p>	
52	4.4 Creating a new exemption	Vector Metering	<p>"3. Substitution Required3 : Identifies if meter reads for the NMI will require substitution until the issue resolution and the MDP has been notified."</p> <ul style="list-style-type: none"> <li>We do not agree this field should be mandatory. The MC raising the Malfunction Exemption request has little information regarding the</li> </ul>	<p>AEMO notes the respondent's comment and refers to the response in table 4, item 50.</p>



No.	Section	Stakeholder	Participant comments	AEMO response
			<p>nature of the malfunction until the new MP has attended site. Where it is raising the exemption request because it cannot get access to the site to resolve the issue within in the time period specified under 7.8.10(a) it will have no idea if subs are required or not. Where the Malfunction is on a legacy meter the DNSP will have alerted the retailer of the malfunction and the retailer will have nominated a new MC and request the MC to arrange for the meter to be exchanged. However the MDP (DNSP) could still be reading the meter. In these cases the details of the impact of any malfunction are not provided to the MC.</p> <ul style="list-style-type: none"> <li>This clause also references a foot note that points to 7.8.10(d). It is unclear how this rule is related to Sub data.</li> </ul>	
53	4.4 Creating a new exemption	Yurika Metering	Yurika Metering suggests that access to this functionality should be available in the MSATS Pre-Prod environment prior to Production go-live to allow Participants to review, test and develop interfaces to internal processes/systems.	AEMO notes that the functionality will be in pre-prod as the release will follow standard processes which includes pre prod access and testing.
54	4.5 Reviewing an exemption	Alinta Energy	N/A	
55	4.5 Reviewing an exemption	CitiPower Powercor	CitiPower Powercor would like clarification on what is contained in this CR5101 i.e. does it only contain the Meter Malfunction Exemption fields or will other fields be present?	AEMO notes that as per the MSATS CATS Procedure, CR5101 will contain the exemption fields for the meter malfunction exemption which were added during the MSATS Standing Data Review consultation
56	4.5 Reviewing an exemption	Intellihub	None.	
57	4.5 Reviewing an exemption	Origin Metering Coordinator	No comments	
58	4.5 Reviewing an exemption	PLUS ES	<p>Additional information to be included to clarify the below:</p> <ul style="list-style-type: none"> <li>When the exemption is in the 'For Review' Status the exemption details cannot be changed or updated. What is the process the MC should follow to update the exemption whilst in Review? i.e. cancel the exemption to reapply with updated information or do they have to wait for the status to be changed by AEMO?</li> </ul>	<p>AEMO notes the respondent's comments and provides the following comments:</p> <ul style="list-style-type: none"> <li>Only AEMO can update exemptions while in the review status, MCs can update the exemption once the review status is changed. AEMO will amend the guideline to clarify this point.</li> </ul>

No.	Section	Stakeholder	Participant comments	AEMO response
			<ul style="list-style-type: none"> <li>Note the table 5.1.4 notes the exemption status code as Review not For Review</li> <li>Foot note 5: how will the MC be notified if AEMO update the end date and at what stage will AEMO be updating the end date. Only at approval?</li> <li>Typo - Depending on the Exemption category value the following processed will be performed. Amend the word processed to processes.</li> <li>Foot note 6: What is the process to include additional enumerations? Will participants be able to request them?</li> <li>What is the timeframe from when the exemption is approved to when MSATS is updated?</li> <li>Type 4A SDQ check –                             <ul style="list-style-type: none"> <li>will this be in addition to the approval status in the exemption portal? Noting that the solution does not provide the MC the ability to view the exemption type (malfunction or Type 4a) from the exemption window or to sort by it (highly desirable and beneficial) for efficient monitoring and management.</li> <li>PLUS ES recommends the delivery date of the SDQ is on a specific date of the week.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Table 5.1.4 will be amended to include “For Review” instead of “Review”</li> <li>AEMO will update the end/expiry date at approval.</li> <li>Type will be corrected in the guideline.</li> <li>The process to include additional enumerations is through the ICF process in the ERCF</li> <li>MSATS NMI standing data is updated in the next batch run which happens daily.</li> <li>Type 4A SDQ check is a report that will notify MCs of exemptions that have been approved within the previous 7 days.</li> </ul>
59	4.5 Reviewing an exemption	United Energy	United Energy would like clarification on what is contained in this CR5101 i.e. does it only contain the Meter Malfunction Exemption fields or will other fields be present?	AEMO notes the respondent’s comment and refers to the response in table 4, item 57.
60	4.5 Reviewing an exemption	Vector Metering	It appears that there is a missing status. Assuming the AEMO will not start its review of the exemption application until the supporting documentation described in Appendix B is received, and that this is now a two step process and there could be some time between the creation of the request and the sending of the supporting documentation then there should a status of ‘Waiting for supporting data’ before AEMO can commence its review process. AEMO may then request more information via the ‘more data’ status. This status reflects that AEMO has commenced the review process but requires more information.	AEMO notes that the status “More Info” is sufficient and achieves what the participant is seeking.
61	4.5 Reviewing an exemption	Yurika Metering	Yurika Metering provides no comment.	
62	4.6 Providing more information	Alinta Energy	N/A	

No.	Section	Stakeholder	Participant comments	AEMO response
63	4.6 Providing more information	CitiPower Powercor	No comment	
64	4.6 Providing more information	Intellihub	<p>Clause 4.6.1: It states that validations will reject the NMI if "... NMI is included in another active exemption id". However, clause 3 states that exemptions are granted to the Current MC, which means any NMI with exemption granted to a MC who is no longer the Current MC is no longer valid. To avoid any doubt, we suggest that the validation statement be updated to:</p> <p style="padding-left: 40px;">NMI is included in another active exemption id that is granted to the Current MC.</p> <p>Clause 4.6.1.1.b: Grammar error in the statement "selecting the check box next to a NMI(s), updating the Planned fix data and/or Substitute required checkbox, then selection the Change NMI details action". Change 'selection' to 'selecting'</p>	AEMO agrees with the respondent's comments and will amend the guideline accordingly.
65	4.6 Providing more information	Origin Metering Coordinator	No comments	
66	4.6 Providing more information	PLUS ES	<ul style="list-style-type: none"> <li>Foot note 7 – review and amend for grammar.</li> <li>This section notes status code of More Data. Table 5.1.4 has a code of More Info.</li> </ul>	<p>AEMO agrees with the respondent's comment and will amend the guideline.</p> <p>AEMO notes that the system screenshots in the guideline are only mock-ups at this stage and will be updated once the system is updated in the final determination.</p>
67	4.6.1	PLUS ES	<p>PLUS ES seeks clarifications on the following:</p> <ul style="list-style-type: none"> <li>Clause 1(a): Does the action remove the NMI from the list of NMIs or set the status of the NMI to removed?</li> <li>Clause 1(b): Typo – amend the word selection to select.</li> <li>Cause 2(a): if the exemption cannot be updated whilst in Review and not after it has been approved does this mean additional NMIs can be uploaded when the exemption status is only NEW. If this determination is correct then the clause should be amended to note the correct exemption status code to remove ambiguity or misinterpretation.</li> <li>any NMIs that fail validation will be excluded from the exemption. Assume that the status of the NMI will be set to rejected rather than the NMI be excluded.</li> </ul>	<p>AEMO notes the respondent's comments and provide the following comments:</p> <ul style="list-style-type: none"> <li>Clause 1(a): The action Remove sets the status of the NMI to removed.</li> <li>Clause 1(b): Typo will be amended in the guideline.</li> <li>Clause 2(a): A NMI can be added to an exemption at creation time, or when more info is requested. NMIs cannot be added in the review status of after the exemption is approved.</li> <li>All NEM valid NMIs will be loaded and set to rejected if they fail validation. If a NMI</li> </ul>

No.	Section	Stakeholder	Participant comments	AEMO response
			<ul style="list-style-type: none"> <li>When a NMI is rejected will the reason why it failed validation be provided and where?</li> </ul>	<p>does not exist in MSATS, it will not be loaded.</p> <ul style="list-style-type: none"> <li>No reasons will be provided if a NMI is rejected and failed validations.</li> </ul>
68	4.6 Providing more information	United Energy	No comment	
69	4.6 Providing more information	Yurika Metering	Yurika Metering provides no comment.	
70	4.7 Managing an exemption	Alinta Energy	N/A	
71	4.7 Managing an exemption	AusNet	We question the cost benefit justification on re-introducing this process, we understand this was a requirement previously. We consider the existing process functions adequately	AEMO notes that the exemption automation was introduced to support an efficient process for populating the meter malfunction exemption fields which were added in the MSATS Standing Data Review consultation.
72	4.7 Managing an exemption	CitiPower Powercor	No comment	
73	4.7 Managing an exemption	Intellihub	None.	
74	4.7 Managing an exemption	Origin Metering Coordinator	No comments	
75	4.7 Managing an exemption	PLUS ES	<ul style="list-style-type: none"> <li>Diagram 12 – shows the exemption as rejected but the left-hand pane has the status as active. Is this a viable scenario or it is an erroneous example. If the later, may AEMO provide clarification details.</li> </ul>	AEMO notes that the system screenshots in the guideline are only mock-ups at this stage and will be updated once the system is updated in the final determination.
76	4.7.1	PLUS ES	<ul style="list-style-type: none"> <li>Following Diagram 14 – mention is made of an exemption action button. None of the screen shots show the exemption action button. Recommend either the correct name of the button is used or a screen shot is included.</li> <li>Further clarification is required with the following sentence: Once updates to the all NMI details have been completed, selection of the</li> </ul>	AEMO agrees with the respondent's comment and will amend the guideline.

No.	Section	Stakeholder	Participant comments	AEMO response
			<p>Save changes button will process the exemption changes. As this is not under the NMI update section.</p>	<p>AEMO notes that the system screenshots in the guideline are only mock-ups at this stage and will be updated once the system is updated in the final determination.</p>
77	4.7.2	PLUS ES	<p>PLUS ES seeks clarification on the following:</p> <ul style="list-style-type: none"> <li>• What happens to submitted extensions which have not been actioned by AEMO before the expiry date, i.e inflight extension requests.</li> <li>• 14 days: there appears to be a misalignment of days and business days between this guideline and the procedures. PLUS ES recommends that the timeframe is bus days and that the timeframe is extended to 20 bus days at a minimum to allow the MC to complete the review and submit the request before it expires. (As per our feedback against the procedures)</li> </ul>	<p>AEMO notes that an extension needs to be applied for one week before the expiry date.</p> <p>AEMO notes that days here mean calendar days and not business days. AEMO agrees to change the timeframe to 21 days and will amend the guideline accordingly. AEMO notes the reports are weekly reports and meter exemptions may repeat if the extension was not granted or resolved.</p>
78	4.7.3	PLUS ES	<p>PLUS ES recommends that:</p> <ul style="list-style-type: none"> <li>• The MC churn report is also to be provided to the new MC as a notification process that there is a exemption on that NMI.</li> <li>• What happens to the NMI status of MC Churn, if the exemption code is set to cancelled or resolved? Does it change or remain?</li> <li>• Last paragraph ...If the New MC... see PLUS ES feedback's related to the procedure. <ul style="list-style-type: none"> <li>○ The process also requires clarification as it is not quite clear what the old MC needs to do, vs AEMO vs the new MC. i.e if the new MC has to raise a new application, who changes the status to MC churn? Is this status then treated as closed which should not prevent the new MC raising an exemption against the NMI. <ul style="list-style-type: none"> <li>▪ If NMI validation looks for the same NMI in multiple exemptions, does it validate against the participant ID. i.e. an exemption exists for the NMI with MC (A) and MC(B), the new MC, wants to raise an exemption against the same NMI.</li> </ul> </li> <li>○ PLUS ES also questions the validity of a statutory declaration and if the 5 business provides enough of a timeframe. Doesn't the MC have 15 bus days to apply for an exemption from when they are notified? (As per our feedback against the relevant procedures)</li> </ul> </li> </ul>	<p>AEMO notes the respondent's comments and provides the following comments:</p> <ul style="list-style-type: none"> <li>- The MC churn report will only go to the new MC.</li> <li>- Only NMIs with active status on the meter exemption will change.</li> <li>- The old MC may remove the NMI from their exemption list in their system, AEMO will raise the CR in MSATS to remove the exemption number and date, the New MC may apply for a new exemption if required.</li> <li>- Regarding the comment around the statutory declaration, AEMO notes that this is out of scope for this consultation and the participant may raise and ICF for it through the ERCF.</li> </ul>

No.	Section	Stakeholder	Participant comments	AEMO response
79	4.7 Managing an exemption	United Energy	No comment	
80	4.7 Managing an exemption	Yurika Metering	In relation to clause 4.7.3 Churn of Metering Coordinator, where a new MC submits an application to reissue an existing exemption following the churn of the MC role, Yurika Metering queries whether the existing exemption number will be retained or will a new number be issued.	AEMO notes that a new exemption id is issued for new exemption submitted by the new MC.
81	4.8 Viewing closed exemptions	Alinta Energy	N/A	
82	4.8 Viewing closed exemptions	CitiPower Powercor	No comment	
83	4.8 Viewing closed exemptions	Intellihub	None.	
84	4.8 Viewing closed exemptions	Origin Metering Coordinator	No comments	
85	4.8 Viewing closed exemptions	PLUS ES	Does the MC have the ability to download a NMI list from a closed exemption?	AEMO notes that once an exemption is closed the NMI list cannot be downloaded.
86	4.8 Viewing closed exemptions	United Energy	No comment	
87	4.8 Viewing closed exemptions	Yurika Metering	Yurika Metering provides no comment.	
88	4.9 Exemption notifications	Alinta Energy	N/A	
89	4.9 Exemption notifications	CitiPower Powercor	CitiPower Powercor would like clarification on the paragraph relating to “Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101	AEMO notes that the field names will be there but with no data as per standard xml format.

No.	Section	Stakeholder	Participant comments	AEMO response
			<p>has completed. This notification will remove the exemption number and expiry date.”</p> <p>Does this indicate nulls or blanks in the relevant exemption fields? Will the meter exemption fields be the only fields present?</p>	
90	4.9 Exemption notifications	Intellihub	<p>ME_EXPIRE_SOON: could this be set to 21 calendar days to allow more time to manage this report?</p> <p>ME_EXPIRE_SOON: could you please clarify what are sdr_key_2 and sdr_key_3?</p> <p>ME_EXPIRED: Please clarify what sdr_key_2 and sdr_key_3 are.</p> <p>ME_MC_CHURN: Please clarify what sdr_key_3 and Field are.</p> <p>ME_T4_REVIEW: Can this be renamed to ME_T4A_REVIEW? Also, could you please clarify what sdr_key_3 and Field are?</p> <p>We wish to suggest new reports:</p> <ul style="list-style-type: none"> <li>Malfunctions (if AEMO does not automatically update the NMI to 'resolved' when NMI status changes to X): ME_EXTINCT where a NMI changes to X status that is part of an active exemption. Would allow MCs to set the NMI to 'resolved'.</li> <li>MRAMS (if AEMO does not populate MSATS for a Type4A exemption approvals): ME_T4A_MC_CHURN where a Type 4A has an approved exemption and there is a change in MC. Would allow new MCs to better identify and apply for an exemption.</li> <li>Malfunction now metered (if AEMO does not automatically resolve a NMI when there is a change in meter type):</li> </ul>	<p>AEMO notes the respondent's comments and provides the following comments:</p> <ul style="list-style-type: none"> <li>- AEMO agrees with increasing timeframe to 21 days for ME_EXPIRE_SOON</li> <li>- sdr_key_2 and sdr_key_3 are fields not being used in the SDQ query.</li> <li>- AEMO agrees with changing T4 to T4A and will amend the guideline.</li> </ul> <p>Regarding the request for new reports, AEMO notes this is out of scope for this consultation and suggests participant raise an ICF through the ERCF.</p>

No.	Section	Stakeholder	Participant comments	AEMO response
			ME_MALFUNCTION_METERED where a NMI has an approved exemption and meter type has now changed to COMMS1 to 4, COMMS4C, COMMS4D or MRAM. Would allow the MC to update the status to resolved.	
91	4.9 Exemption notifications	Origin Metering Coordinator	No comments	
92	4.9 Exemption notifications	PLUS ES	<ul style="list-style-type: none"> <li>There is more value in knowing how many NMIs still remain active in a report than the NMI QT of the individual exemption.</li> <li>ME_EXPIRE_SOON: PLUS ES recommends that the frequency aligns with the requirements of the procedure.                             <ul style="list-style-type: none"> <li>The procedure calls for 14 business days</li> <li>The small customer procedure calls for submitting a new application 3 months in advance</li> <li>This report should be provided at a more frequent rate, such as daily, if the MC is to have sufficient time to review and apply for an extension or submit a new application before the expiry date.</li> </ul> </li> <li>PLUS ES recommends that a report is also developed and provided for the T4A exemption expiration report. The timelines and frequency should align with the procedure requirements.</li> <li>ME_MC_CHURN: this should also be provided to the new MC.</li> <li>The last 2 paragraphs with respect to CR notifications: needs to be made clear that it is only applicable to Malfunction type exemptions.</li> </ul>	<p>AEMO notes the respondent's comments and provide the following comments:</p> <ul style="list-style-type: none"> <li>Reports can be run out of the database to know how many NMIs still remain active.</li> <li>AEMO will increase the timeframe for ME_EXPIRE_SOON to 21 calendar days.</li> <li>All meter exemptions will be included in the ME_EXPIRE_SOON report regardless of the meter exemption type.</li> <li>ME_MC_CHURN report only goes to the new MC.</li> <li>AEMO agrees with clarifying the last two paragraphs with respect to CR notifications and will amend the guideline accordingly.</li> </ul>
93	4.9 Exemption notifications	United Energy	<p>United Energy would like clarification on the paragraph relating to "Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101 has completed. This notification will remove the exemption number and expiry date."</p> <p>Does this indicate nulls or blanks in the relevant exemption fields? Will the meter exemption fields be the only fields present?</p>	AEMO notes the respondent's comment and refers to the response in table 4, item 91.
94	4.9 Exemption notifications	Vector Metering	<ul style="list-style-type: none"> <li>We do not agree that MC's should be required to constantly monitor the AEMO portal to check if status changes have been made against Exemption Applications waiting for approval. There must be a process that MC's are notified when the status of an exemption application changes. This could be achieved by 'pushing' reports daily or Email notifications as each application changes state. Relying on MC resources to be constantly reviewing the portal is inefficient and a backward step from what is in place today.</li> </ul>	Regarding the suggested improvement, AEMO notes that this is out of scope for this consultation and suggests that the participant raise an ICF for this through the ERCF.



No.	Section	Stakeholder	Participant comments	AEMO response
			<ul style="list-style-type: none"> <li>The last two paragraphs indicate that CR's will be sent to all affected participants when a exemptions change state. This only applies to exemptions created under Exemption Procedure (Metering Installation Malfunctions), not for Type4A exemptions. These paras should be updated to make this clear.</li> </ul>	AEMO agrees with clarifying the last two paragraphs and will amend the guideline.
95	4.9 Exemption notifications	Yurika Metering	Yurika Metering provides no comment.	
96	4.10 Transition of existing exemptions	Alinta Energy	It is not clear if participants associated with the NMI will suddenly receive bulk lot of transactions as a result of AEMO transitioning existing exemptions.	AEMO notes that participants will receive all CR5101 notifications as per the MSATS CATS procedure at transition of existing exemptions.
97	4.10 Transition of existing exemptions	CitiPower Powercor	No comment	
98	4.10 Transition of existing exemptions	Intellihub	None.	
99	4.10 Transition of existing exemptions	Origin Metering Coordinator	No comments	
100	4.10 Transition of existing exemptions	PLUS ES	PLUS ES seeks further detail/clarification with respect to the scope of transitioning existing exemptions. Does the transitioning of exemptions includes loading them in the portal or just loading the exemption ID and expiry date in MSATS.	AEMO notes the transitioning of exemptions includes both loading them in the portal and loading the exemption ID and expiry date in MSATS.
101	4.10 Transition of existing exemptions	United Energy	No comment	
102	4.10 Transition of existing exemptions	Yurika Metering	Yurika Metering provides no comment.	
103	4.11 CSV formats	Alinta Energy	N/A	
104	4.11 CSV formats	CitiPower Powercor	No comment	

No.	Section	Stakeholder	Participant comments	AEMO response
105	4.11 CSV formats	Intellihub	None.	
106	4.11 CSV formats	Origin Metering Coordinator	No comments	
107	4.11 CSV formats	United Energy	No comment	
108	4.11 CSV formats	Vector Metering	Link to CSV standard er <a href="https://portal.prod.nemnet.net.au/help/Content/CSVdataFormat/CSV_Format.htm">https://portal.prod.nemnet.net.au/help/Content/CSVdataFormat/CSV_Format.htm</a> only works if you are connected to Market Net. Should be publicly available.	AEMO notes the respondent's comment and will update the link in the guideline accordingly.
109	4.11 CSV formats	Yurika Metering	Yurika Metering suggests that access to this functionality should be available in the MSATS Pre-Prod environment prior to Production go-live to allow Participants to review, test and develop interfaces to internal processes/systems.	AEMO notes the respondent's comment and refers to the response in table 4, item 55.
110	4.12 API Navigation	Alinta Energy	N/A	
111	4.12 API Navigation	CitiPower Powercor	No comment	
112	4.12 API Navigation	Intellihub	None.	
113	4.12 API Navigation	Origin Metering Coordinator	No comments	
114	4.12 API Navigation	United Energy	No comment	
115	4.12 API Navigation	Yurika Metering	Yurika Metering suggests that access to this functionality should be available in the MSATS Pre-Prod environment prior to Production go-live to allow Participants to review, test and develop interfaces to internal processes/systems.	AEMO notes the respondent's comment and refers to the response in table 4, item 55.
116	5.1.2 Exemption codes	PLUS ES	<ul style="list-style-type: none"> <li>Shared fuse: PLUS ES suggests this is a nature of an exemption and not a type of exemption, similar to access issues and should be moved to table 5.1.3.</li> <li>No network telecoms network: we believe the options for this should be no telecoms network and Environ. The alternative telecoms network could fit into the generic telecoms network.</li> </ul>	<p>AEMO notes that "Shared Fuse" is highlighted as type of exemption due to the specific obligations in the NER;</p> <ul style="list-style-type: none"> <li>clause 7.8.10C (Timeframes for meters to be installed – where a connection alteration is required)</li> </ul>

No.	Section	Stakeholder	Participant comments	AEMO response
				<ul style="list-style-type: none"> <li>clause 7.16.3 (c) (7); requirements relating to the identification and recording of shared fuse arrangements for multiple connection points (shared fuse arrangements),"</li> </ul> <p>Having this in the level of "Type of exemption" highlights its importance and the specific obligations in the Rules.</p> <p>Regarding the respondent's comment on the No network telecoms network, AEMO notes that this is a different "type of exemption" which refers to the "Small Customer Metering Installation (Type 4A Exemption)", Manually Read Type 4A.</p> <p>This is not under "Metering Installation Malfunction Exemption".</p>
117	5.1.3 Nature of exemption	PLUS ES	<p>PLUS ES recommend:</p> <ul style="list-style-type: none"> <li>Adding the shared fuse against the parent Types: Defective and Family                             <ul style="list-style-type: none"> <li>Adding an additional code of MC admin to cater for situations that the sites have not been visited but an exemption has been requested to meet the 15 business days rules obligation. i.e resourcing/scheduling</li> </ul> </li> <li>Removing the Parent Type shared fuse as per comments for section 5.1.3</li> <li>Removing the Parent type of NOALTNWK as per comments in section 5.1.2</li> <li>Removing all the codes for the 4A Parent types Environ and NOPUBNTWK. If there is no coverage it is either due to the environment or the telecommunications network and any other sub reason is irrelevant or not applicable. Unlike Malfunctioning meters.</li> </ul>	<p>AEMO notes the respondent's comment and refers to the response in table 4, item 118.</p>
118	5.1.4 Exemption status code	PLUS ES	<p>PLUS ES recommends the following:</p> <ul style="list-style-type: none"> <li>Providing some clarifying detail in the description column in place of copying the codes i.e. active = approved, review = validated and AEMO reviewing etc</li> </ul>	<p>AEMO notes that the description is a database description and not a process description, the header will be modified to avoid confusion.</p>

No.	Section	Stakeholder	Participant comments	AEMO response
119	5.1.5 Exemption NMI Status Codes	PLUS ES	<p>PLUS ES recommends the following:</p> <ul style="list-style-type: none"> <li>• Providing some clarifying detail in the description column in place of copying the codes i.e. active = approved, review = validated and AEMO reviewing etc</li> <li>• When does one use the codes cancelled vs removed?</li> </ul>	<p>AEMO notes the respondent's comment and refers to the response in table 4, item 120.</p> <p>AEMO notes that a meter can be removed before approval, but cancellation can be done at any time while the exemption is active.</p>
120	5. Appendix A	Intellihub	<p>Clause 5.1: This is going to impose a lot of extra work on MC's as currently exemptions that are applied for in bulk are not split by exemption type codes/nature of exemptions categories.</p> <p>When new bulk exemptions are applied for we may not know at that point what is the appropriate exemption type codes/nature of exemptions categories other than the meter has malfunctioned. Splitting meter malfunctions by categories could result in up to 12 different exemptions if that info is provided by FRMPS (and there is no standard text either) and there will be a lot more data trawling to split out the data which means even though we are going to an automated platform it will result in many more exemptions under management than is currently the case which goes against the NEO.</p> <p>If AEMO want exemptions split out into categories, then they need to allow MCs to create rolling bulk exemptions where sites can be added and resolved. They would still have an expiry date but could be reconciled periodically so sites could be resolved, and new ones added if these sites cannot be rectified with in the MIT timeframes. There is no reference in the NER or the Malfunction Exemption Procedure which would prevent this only AEMO's interpretation of the rules, and the new automated system functionality could allow for this especially if the proposed further automation processes are adopted.</p> <p>Clause 5.1.3: We suggest another exemption nature called 'faulty metering equipment' be added for the scenario where it is not practically possible to rectify these malfunctions within the allowable timeframes. We suggest the following be added:</p> <p>CODE TYPE CODE PARENT TYPE DESCRIPTION</p>	<p>Clause 5.1: AEMO notes that the most used and high-level statuses were added to enable reporting to the AER.</p> <p>Clause 5.1.3: AEMO notes that it is expected the MC (through their MP) has visited the sites and determined the nature and specific malfunction on the metering installations before they apply for exemptions, if required.</p> <p>The Rules and Procedures are clear on this obligation;</p> <ul style="list-style-type: none"> <li>• NER Clause 7.8.20 (a) - Metering installation malfunctions</li> <li>• Metering Installation Malfunction Exemption Procedure Section 2.4 - Matters taken into Consideration</li> </ul> <p>This also reinforces the requirements and expectations on MCs to visit the visit and assess the sites before applying for exemptions.</p> <p>Since the retailers and LNSPs are the ones providing the firsthand information, the MCs may request them to provide the details of malfunctions/ defects rather than "general terms" like "defective or malfunction sites".</p>

No.	Section	Stakeholder	Participant comments	AEMO response
			EXEMPTION_NATURE METER DEFECTIVE FAULTY METERING EQUIPMENT EXEMPTION_NATURE METER FAMILY FAULTY METERING EQUIPMENT	(At the moment, MCs are applying for exemptions as soon they received the NMIs list from retailers and LNSPS before conducting site visits/ assessments.)
121	Appendix A 5.1.2. Exemption Type Codes	Vector Metering	<ul style="list-style-type: none"> <li>'Shared Fuse' is not a Metering Installation Malfunction so cannot be used as a reason to apply for an exemption under 7.8.10. It should be in the Exemption Nature table under Malfunctions (Family, Defective).</li> <li>There should only be one TYPE4A and that is 'No Comms'. That is the only reason for raising a Small Meter installation Exemption. No Pub/No ALT/Environ should be moved to Exemption Nature.</li> </ul>	AEMO notes the respondent's comment and refers to the response in table 4, item 118.
122	6. Appendix B	Intellihub	Can we include the NMI number in the Email Subject line for single NMI exemption requests as well?	AEMO notes that NMI number can be added at the end of the subject line if the participant wishes to add it, however exemption number still needs to be provided in the Subject line.
123	6.0	PLUS ES	For the Note section: and Type 1-4 (large), as per feedback provided in the associated procedure, PLUS ES recommends that the MDP action plan should not be required.	AEMO notes the respondent's comment and refers to the response in table 2, item 85.
124	Other Audit Trail	Vector Metering	We have some concerns about the availability of reports that can provide a full audit trail of an exemption. This is likely to be required by MC's for their annual MC audits. If MC are to be required to use the portal to administer Exemptions then full audit reports including date/times of changes are required.	<p>AEMO notes this is available and it appears in the windows of the exemption, it is the history on the right-hand side.</p> <p>AEMO notes that reporting out of the portal is out of scope and suggests participant raises ICF through the ERCF.</p>

**Table 5 Retail Electricity Market Procedures – Glossary and Framework**

No.	Section	Description	Stakeholder	Participant comments	AEMO response
1	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	Alinta Energy	N/A	
2	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	CitiPower Powercor	No comment	
3	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	Intellihub	Agree.	AEMO notes the respondent's agreement with the proposed change.
4	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	Origin Metering Coordinator	No comments	
5	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	United Energy	No comment	
6	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	Yurika Metering	Yurika Metering is supportive of this change.	AEMO notes the respondent's agreement with the proposed change.

**Table 6 Other Issues Related to the metering installation Exemption Automation**

No.	Participant comments	Stakeholder	AEMO response
1	AEMO will be aware of the Australian Energy Market's Commission's (AEMC) ongoing review of the regulatory framework for metering services (the Metering Review) which seeks to accelerate and streamline the installation of	AGL	AEMO is aware of the AEMC's Metering Review, however regardless of the review outcome the exemption process for metering installation types 4 and 4A will still be in place, and as a result the automation is still needed.

No.	Participant comments	Stakeholder	AEMO response
	<p>smart meters across the National Energy Customer Framework (NECF) jurisdiction. As part of its Draft Report, the AEMC is proposing two large scale amendments to the National Energy Retail Rules and the National Electricity Rules which will have a material impact on the metering installation exemption process for Metering Coordinators and other market participants</p> <ul style="list-style-type: none"> <li>• The complete removal of the exemption process subject to this consultation; and</li> <li>• The introduction of a new customer-side defect notification process which, with some amendments, could potentially leverage the existing metering installation exemption framework already in place, thereby minimising costs and IT development requirements for AEMO, Metering Coordinators and retailers.</li> </ul> <p>The outcome of the Metering Review and the Final Report are anticipated to be released sometime in Q3 2023, and although the subsequent recommendations will need to undergo further public consultation and legislative/rule changes to take effect (likely to occur in 2025), AEMO will have a strong gauge of what the new metering framework will look like in NECF.</p> <p>AGL generally supports reforms that move away from manual intervention towards automation and digitalisation. However, at this time, it is AGL's recommendation that the Metering Installation Exemption Automation consultation be deferred until the outcome of the Metering Review is released. There is a risk that if AEMO's automation proposal were to proceed, and the exemption process is removed by the AEMC, participants (and ultimately consumers) will have incurred costs to operationalise the soon-to-be obsolete reforms.</p> <p>If the exemption process is to be removed by the AEMC, AEMO should instead consider how the existing process can be extended to accommodate the proposed customer site defect process. The AEMC Draft Report proposes that a</p>		

No.	Participant comments	Stakeholder	AEMO response
	<p>customer notification and recordkeeping process in circumstances where MCs encounter site defects. We consider that the existing exemption back-end architecture may be able to be amended or repurposed to support the new AEMC draft proposal to minimise build costs and timeframes.</p>		
<p>2</p>	<p><b>Timing of Exemption Applications</b></p> <p>AGL notes that AEMO is proposing to extend the timeframes for its determination of an application for exemption by up to fifteen business days (from two to five days for the initial application determination and from five to ten days where AEMO requests additional information from the MC). While AGL understands that this change is intended to accommodate the high volume of exemption applications which AEMO has been receiving, the impact on industry has not been fully assessed. For example, will these timeframes allow for MCs to attempt to rectify the malfunction in the first instance, or will they result in MCs immediately applying for an exemption so as to not risk adherence with the meter malfunction replacement timeframes?</p>	<p>AGL</p>	<p>AEMO notes that under the rules, MCs have 15 business days to fix the meter malfunction for small customer metering installations and 2 business days for meter types 1-3. However, once the MC applies for an exemption to AEMO then the exemption procedure timeframes takes place and the AEMO exemption process starts.</p>
<p>3</p>	<p><b>Requirement for Additional Information</b></p> <p>Clauses 3.5(c) and 2.3(a)(ii) of the Metering Exemption – Small Customer Metering Installation and Malfunction Draft Documents (the Draft Documents) outline that while the application for the exemption is designed to be an automated process within MSATS, in the event that AEMO requests additional information from the MC, this is to be delivered via email. This implies substantial reliance on manual intervention will remain, specifically to collate, attach and email AEMO documents pertaining to the site/s subject to the exemption application process. It is unclear what efficiencies are to be gained by segmenting the current process into two streams, resulting in only a partial automation of the exemption process.</p>	<p>AGL</p>	<p>AEMO notes that the current MSATS functionality doesn't support the uploading and managing of external documents.</p> <p>AEMO notes that the type of additional information that may be requested by AEMO upon receipt of the exemption application is as per current process and obligations, the automation does not change this.</p> <p>AEMO clarifies it will make request for additional information by changing the exemption application status in the MSATS portal.</p>



No.	Participant comments	Stakeholder	AEMO response
	<p>Further, the Metering Exemption Draft Documents do not specify the type of additional information that may be requested by AEMO upon receipt of the exemption application which could result in further delay in procuring the necessary data. AEMO should provide clear guidelines in the Draft Documents on the types of supporting information that may be requested following an exemption application and the circumstances in which MCs may be required to provide this information.</p> <p>The Draft Documents do not address how AEMO will make the request for additional information (e.g., by way of email, an automated process, CR or MSATS status update).</p>		
4	<p>AGL sees no reason why the exemption reporting module cannot accommodate Retailer reporting of exemptions.</p> <p>This would include not just by MC, but combination of MC, DB, postcode, exemption type etc</p> <p>With the accelerated meter rollout proposed by the AEMC (and expected to be required) AGL believes that the ability to manage special programs of work for exempted meters will be important for an efficient completion of this work.</p>	AGL	<p>AEMO notes this was a late submission.</p> <p>AEMO notes this is out of scope, as it is not a Retailer obligation to manage exemptions, it is the obligation of the MC. AEMO suggests the respondent raise a ICF for this through the ERCF.</p>

