

METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the metering installation exemption automation consultation.

2. Question on Metering Installation Exemption Automation Effective Date

Heading	Participant Comments
Do you agree with the 1 November 2023 effective date? If not, why not?	Yes, but we prefer weekends for system releases and Monday's for procedure effective change dates.

3. Exemption Procedure (Metering Installation Malfunctions)

Section	Description	Participant Comments
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	
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	

Section	Description	Participant Comments
2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	
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>	
2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	
2.6 Application Unsuccessful	<p>deleted the following point:</p> <p>(a) A failure to complete the application form;</p>	
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>	
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.	

Section	Description	Participant Comments
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	
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	
3.2 Contents	Added a new section on the MDP action plan	
Appendix A. Application for Exemption	Deleted Appendix A	
Appendix B. Application for Extension	Deleted Appendix B	

4. Metering Exemption (Small Customer Metering Installation)

Section	Description	Participant Comments
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	<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> <ol style="list-style-type: none"> 1. <i>After clause 7.8.3(c) insert: ‘(d) This clause 7.8.3 does not apply in Victoria in respect of relevant metering installations.’</i> 2. <i>After clause 7.8.4(i) insert: ‘(j) This clause 7.8.4 does not apply in Victoria in respect of relevant metering installations.’</i> <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>
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	

Section	Description	Participant Comments
3.2 Form of Application	Updated section to reflect the new automated exemption process	
3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	
3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	
4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	
4.3 Change in Circumstances	Deleted reference to Appendix A	
Appendix A. Application for Exemption	Deleted Appendix A	

5. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments
3. Application process	
3.1 Generally	
3.2 Responsibility	
3.3 Supporting Information to support Application	
4. Creation and Management of an Application	
4.1 Exemption life cycle	
4.2 Navigation to exemptions	
4.3 Exemption list	
4.4 Creating a new exemption	
4.5 Reviewing an exemption	
4.6 Providing more information	

Section	Participant Comments
4.7 Managing an exemption	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
4.8 Viewing closed exemptions	
4.9 Exemption notifications	
4.10 Transition of existing exemptions	
4.11 CSV formats	
4.12 API Navigation	

6. Retail Electricity Market Procedures – Glossary and Framework

Section	Description	Participant Comments
4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	

Metering Procedure Changes
