

12 May 2023

Mr Daniel Westerman  
Chief Executive Officer  
Australian Energy Market Operator  
GPO Box 2008  
MELBOURNE VIC 3001

[NEM.Retailprocedureconsultations@aemo.com.au](mailto:NEM.Retailprocedureconsultations@aemo.com.au)

Dear Mr Westerman

Yurika Metering welcomes the opportunity to provide comment in response to the Australian Energy Market Operator's (AEMO's) consultation on the amendments to the Metering Installation Exemption Automation (consultation).

Feedback and comments on the consultation questions are included in the attached response template.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact me on 0429 394 855 or Laura Males on 0429 954 346.

Yours sincerely,



Alena Christmas  
**Acting Manager Regulation**

Telephone: 0429 394 855  
Email: [alena.christmas@energyq.com.au](mailto:alena.christmas@energyq.com.au)

***Encl: Yurika Metering's comments on the consultation questions***

# METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

*Participant: Yurika Metering*

*Submission Date: 12 May 2023*

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## 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the 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?	Yurika Metering is supportive of the proposed effective date.

## 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	Yurika Metering is supportive of this change.
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 is supportive of this change.

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

Section	Description	Participant Comments
		Settlement and Transfer Solutions (MSATS) providing a notification to participants via the Change Request (CR) notification process following the completion of the CR5101.
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 is supportive of this change.
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	Yurika Metering is supportive of this change.
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	Yurika Metering is supportive of this change.
3.2 Contents	Added a new section on the MDP action plan	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.
Appendix A. Application for Exemption	Deleted Appendix A	Yurika Metering is supportive of this change.
Appendix B. Application for Extension	Deleted Appendix B	Yurika Metering is supportive of this change.

## 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	Yurika Metering is supportive of this change.
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	Yurika Metering is supportive of this change.
3.2 Form of Application	Updated section to reflect the new automated exemption process	Yurika Metering is supportive of this change.
3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	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.
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Yurika Metering is supportive of this change.
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 notes that there is no clause 3.7(c) referenced in the draft procedure.
4.2 Application for Exemption if No	Updated section to reflect the new automated exemption process	Yurika Metering is supportive of this change.

Section	Description	Participant Comments
Change in Circumstances		
4.3 Change in Circumstances	Deleted reference to Appendix A	Yurika Metering is supportive of this change.
Appendix A. Application for Exemption	Deleted Appendix A	Yurika Metering is supportive of this change.

## 5. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments
3. Application process	
3.1 Generally	Yurika Metering provides no comment.
3.2 Responsibility	Yurika Metering provides no comment.
3.3 Supporting Information to support Application	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.
4. Creation and Management of an Application	



Section	Participant Comments
4.1 Exemption life cycle	Yurika Metering provides no comment.
4.2 Navigation to exemptions	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.
4.3 Exemption list	Yurika Metering provides no comment.
4.4 Creating a new exemption	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.
4.5 Reviewing an exemption	Yurika Metering provides no comment.
4.6 Providing more information	Yurika Metering provides no comment.
4.7 Managing an exemption	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.
4.8 Viewing closed exemptions	Yurika Metering provides no comment.
4.9 Exemption notifications	Yurika Metering provides no comment.

Section	Participant Comments
4.10 Transition of existing exemptions	Yurika Metering provides no comment.
4.11 CSV formats	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.
4.12 API Navigation	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.

## 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	Yurika Metering is supportive of this change.