2024 Metering Services Review Package 1 Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft of the 2024 Metering Services Review Package 1.

2. Feedback on the Implementation of the AEMC Metering Services Review Rule

Question - LMRP	Participant Comments
1) What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	PLUS ES' preference is that a formatting consistency exists across B2M and B2B fields. Generally, formatting of 'date' fields is dd/mm/yyyy and subsequently participants may have aligned their own system 'date' formatting to the standard. Consequently, PLUS ES's preference is dd/mm/yyyy. Additionally, the LMRP field value should have a standard definition. We recommend 'Legacy meter replacement must be completed by this date'. For example, if the LNSP schedules a NMI for the FY1 of the LMRP year, assuming the LMRP commences 1 Jul 25, then the LMRP field value should be 30/06/2026.
2) Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	The proposed tools BUT and CRs is adequate to update the LMRP field. PLUS ES proposes that the utilisation of the BUT is limited to the initial population of the LMRP field. Post go live if any LMRP values need to be changed, PLUS ES recommends that a CR is used so that all associated participants receive the notification and update their systems accordingly. The BUT does not provide notifications and a participant who has downloaded the LMRP value prior to any change will be unaware of any changes.

Question - LMRP	Participant Comments
3) Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	To minimise participant impact it would be beneficial for AEMO to provide high-level coordination regarding the upload of the LMRP fields. Furthermore, the NMIs for the first LMRP target year should be updated by LNSPs ASAP and all LMRP NMIs should be updated before the commencement of the Acceleration Smart Meter Deployment.
4) Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	For a large deployment program such as LMRP, PLUS ES supports that standing data quality reports would deliver benefits. Some SDQ proposals: • NMIs with Basic/MRIM and no assigned LMRP value to the LNSP • No Contestable MC assigned to a LMRP NMI within 3 months of the LMRP date - sent to the FRMP. • LMRP NMI where the LMRP date has lapsed, and a legacy meter exists. i.e. No COMMSX meter installed. This report could also include if a defect has been identified against the NMI. To the FRMP & MC.
5) Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	PLUS ES do not support communication of LMRP dates or updates of specific NMIs via CSV files. The CSV file is out of date the minute it is sent.
Additional Feedback	
Technical Solution Description - Inclusion of Greenfield NMI Status	Clarification is required on the inclusion of this NMI status. One assumes that a Greenfield site does not have a meter installed, and since the introduction of Power of Choice, if it did, it would be a Type 1-4. This would require a data clean up activity rather than including them in the LMRP. PLUS ES would expect that a greenfield site would never be sent as a LMRP meter exchange. It would be a 'New Connection'.

Question - LMRP	Participant Comments
Technical Solution Description - LMRP standing data set to NULL upon completion of a meter exchange from BASIC / MRIM to COMMS* / MRAM.	PLUS ES recommends that the LMRP Standing Data set is not updated to NULL following a meter exchange from Basic/MRIM to a COMMSX/MRAM. One of the benefits of including the LMRP in MSATS is having one source of truth for the LMRP schedule and associated reporting.

Question - Defects	Participant Comments
1) Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	PLUS ES' preference is for the Defect Type to be in MSATS instead of a flag. The subsequent process of trying to obtain the defect type via B2B mechanism is restrictive, and does not cater for scenarios where the MC is no longer the MC at the NMI. We also acknowledge AEMO's concerns regarding potential Privacy Act implications, however, a combination of B2M and B2B transactions to communicate the Defect Type compared to one field in MSATS, requires participants to incur unnecessary operational costs which does not provide them the transparency of the MSATS alternative.
2) Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	The Site remediation status field will inform/guide 'new' roles about the status, especially in instances of FRMP churn. For full benefit realisation, there is a dependency on customers notifying/advising their retailer of site remediations and for all retailers to consistently update the field.
3) Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	PLUS ES proposes the following editorial changes: • RemediationSuccessful – could be misleading when communicating that a customer has advised the defect has been remediated. It does not necessarily mean it is 'successful'. Suggest a more general term of 'Remediation Advised'. • RemediationUnsuccessful – similarly this also could be misleading. This information needs to communicate that the customer has not remediated the defect or the retailer has been unable to confirm with the customer. Suggest a more general term of Unremediated.

4) Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	PLUS ES supports that standing data quality reports would deliver benefits. Some SDQ proposals for consideration: • A report identifying a Defect flag has been assigned and Remediation status has not been entered. • Remediation status is not updated within timeframes i.e. first notice enumeration is greater > 3mths, should have changed to second notice or remediation successful. • A Remediation Successful status >20 business days and no meter exchange.
5) Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	PLUS ES supports that the defect process scope should be expanded to include COMMS metering sites with defects and that it is maintained beyond the LMRP timeframe. We support AEMO's option 1 proposal for legacy meters as this would reduce the volume of transactions in the market. However, this option must be expanded to include COMMS meters. Where a 3004/05 or 3090/91 changes the meter number for an existing COMMS meter, the defect attributes are set to NULL or an alternative value.
6) Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	In addition to the above, PLUS ES proposes the enumerations for a Defect flag are NULL, Y (Yes) and N (No), where: • NULL= no defect has been identified for this site • Y = Defect exists on site preventing metering installation and • N = Defect existed on site but is no longer present
Additional Feedback	

Technical Solution Description – Format of Defect flag	Participants with data access should readily identify when the defect flag/enumeration was updated.

3. Feedback on the AEMO review of Retailer of Last Resort processes

Question	Participant Comments
1. Do you agree with the removal of the RoLR reports as proposed? If not, why?	PLUS ES supports the removal of the proposed reports.
Additional Feedback	
Procedure changes in clause to be mirrored in the process diagrams.	PLUS ES recommends that the High Level Process figures are reviewed and amended to align with the final changes in the Procedure. For example, 6.1(d)(iii) has been amended to remove referencing of a communication mechanism for the reports. This should also be reflected in Figure 2.
Clause referencing within Part A and B.	PLUS ES recommends that the whole procedure is reviewed and the clause referencing aligned. Amendments made to clauses have not been accurately reflected within the Procedure (Part A and B). Due to the quantity of misalignments, we have made a note that AEMO need to undertake the activity to ensure the document is updated accordingly. For example, • clauses have been deleted, yet they are still reference within the document e.g. 7.1(c).

Question	Participant Comments
	• In Part B, we have also identified a change in the formatting of subclauses. E.g In Part A 7.1(c) but in Part B the clause has been formatted as 7.1 c). • Clause numbering have changed and the document is referencing old clause numbers, e.g. 11.2(k) etc.

4. Feedback on the Issues and Change Forms (ICFs)

Question – ICF 077	Participant Comments
1. Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	For future consultation consideration, PLUS ES supports having marked up documents at this stage would have enabled a more efficient and robust review of impacted documents.

Question – ICF 078	Participant Comments
1. Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	PLUS ES agrees with the proposed changes. For future consultation consideration, PLUS ES supports having marked up documents at this stage would have enabled a more efficient and robust review of impacted documents.

Question – ICF 079	Participant Comments
1. Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	PLUS ES supports the changes.

5. Feedback on Embedded Network settlement anomalies

Question	Participant Comments
1. Do you agree with the proposed changes to limit: o the ability of ENMs to activate and de-activate NMI(s) retrospectively o the ability of MDPs to activate and de-activate datastreams in embedded networks retrospectively If not, why?	PLUS ES does not support the proposed changes as the approach is placing a blanket rule across all retrospective updates: • Current MSATS logic determines all changes are retrospective. • The Embedded Network processes are likely to be manual, giving rise to 'legitimate' use cases where retrospective updates would be required. • The proposed changes would extend to secondary settlement points (Unlocking CER Benefits). This rule change has not been finalised and the industry has not had the opportunity to understand the downstream implications. PLUS ES recommends: • Further discussions are held with industry participants and options/impacts are explored.

	- A report is developed to identify repetitive retrospective updating (criteria to define repetitive) and participants audited. - AEMO considers removing this item from the current consultation and including it in the Unlocking CER Benefits associated AEMO consultations. This would also enable participants to further familiarise themselves with the rule changes, consider the upstream and downstream impacts and provide better informed feedback.