2024 Metering Services Review Package 1 Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo Energy

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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?	Red Energy and Lumo Energy (Red and Lumo) prefer the date format DD-MMM-YYYY, with the DD-MMM indicating the last day of the quarter/financial year. e.g. 30-JUN-2027
2) Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Red & Lumo agree that the BUT for initial load and CR for any updates are appropriate methods for populating the LMRP field.
3) Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Red and Lumo leave this to DNSP to respond to.
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?	Red and Lumo do not require ongoing standing data reports to identify LMRP in standing data.
5) Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Red and Lumo reserve the right to offer alternative suggestions once the Final Determination is made.

Question - Defects	Participant Comments

1) Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Yes, an MC should be able to update defect fields in MSATS using a CR50XX. The nature of the defect, the original MC and the date the defect was identified should be recorded.
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?	No, these fields communicating retailer notifications to a customer do not belong in MSATS. As long as the date the defect was identified is recorded in MSATS by the MC, then any retailer can initiate or continue the notification process by identifying the business days after the site defect was first recorded in MSATS.
3) Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	No, please see response to question 2. Red and Lumo suggest that a standing data field indicating the date the defect was identified removes the requirement for a new CR to be created for retailer notifications and thus reduces the total number of enumerations as well.
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?	Red and Lumo have not identified any requirement for standing data reports to meet procedural obligations.
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?	Nullifying the defect when a legacy meter has been replaced on-site, and a CR 3004/3005 or 3090/3091 is received seems simplest, however; - What if the defect is identified after a MFN behind a Type 4 comms meter? - What if the defect affects a Type 4 comms meter in a Shared Fuse arrangement with a Type 5 or 6 meters? It is preferable for the MC to set the defect field to NULL when the new meter is installed and the site defect is confirmed to be resolved.

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	Providing a Date Identified field for the MC site defect CR 50XX removes the requirement for a new CR to be created for retailer notifications (presuming amendment of the AEMC rule) and thus reduces the total number of enumerations as well.

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?	Red and Lumo support this proposal as we have not identified any detrimental aspect to this change as it removes summary reporting not detail reporting and improves AEMO's ability to deliver reporting sooner.

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?	Red and Lumo support this proposal

Question – ICF 078	Participant Comments

1. Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Red and Lumo agree with AEMO's assessment and suggest Option 2 is preferable.

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?	Red and Lumo support this change as it appears to address the issue.

5. Feedback on Embedded Network settlement anomalies

Question	Participant Comments
1. Do you agree with the proposed changes to limit: ○ the ability of ENMs to activate and de-activate NMI(s) retrospectively ○ the ability of MDPs to activate and de-activate datastreams in embedded networks retrospectively If not, why?	Red and Lumo suggest that a blanket ban on retrospective changes to NMI status or datastream is problematic because there are valid reasons why these may need to be retrospectively amended, however there is clearly a problem. Can the problem be addressed in another manner rather than removing the ability for retrospective changes? - Identifying how this action is contrary to the best interests of the NEM or conflicts with obligations. - Identifying the participant or customer who initiates these changes in a manner that is contrary to the best interests of the NEM.