

Reform Delivery Committee

3 May 2024

Informed Go Live Workshop:
Unlocking CER Benefits through
flexible trading



1. Welcome

We acknowledge the Traditional Owners of country throughout Australia and recognise their continuing connection to land, waters and culture.

We pay respect to their Elders past, present and emerging.

Agenda

#	Time	Topic	Ask of Committee	Presenter(s)
1	11:00am-11:05am	Welcome	<ul style="list-style-type: none">• <i>N/A</i>	Violette Mouchaileh
2	11:05am-11:10am	Purpose and objectives	<ul style="list-style-type: none">• <i>For noting</i>	Peter Carruthers
3	11:10am-11:20am	HLID overview	<ul style="list-style-type: none">• <i>For noting</i>• <i>Opportunity to seek clarification</i>	Meghan Bibby
4	11:20am-12:20pm	Feedback received and recommendation	<ul style="list-style-type: none">• <i>Discussion of factors impacting rule commencement date</i>• <i>Request for support of recommended commencement date</i>	Meghan Bibby
5	12:20pm-12:30pm	Next steps	<ul style="list-style-type: none">• <i>For noting</i>• <i>Opportunity to seek clarification</i>	Violette Mouchaileh, Peter Carruthers
6	12:30pm	Meeting close		Violette Mouchaileh

Appendix A: Competition law meeting protocol

Appendix B: Glossary

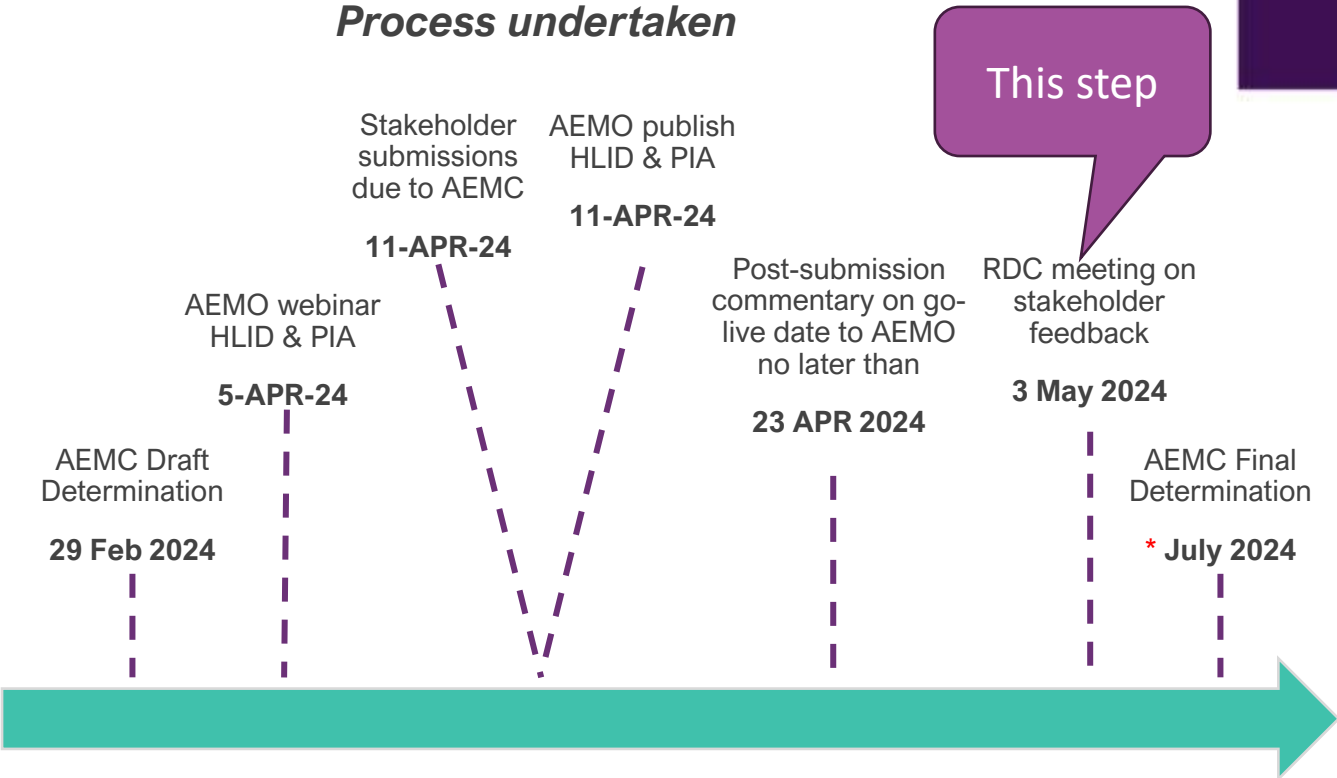
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2. Purpose and objectives

Purpose and objectives

AEMC’s “Unlocking CER benefits through flexible trading arrangements” draft determination (DD) is the first test of the Informed Go-Live process

- At the March 2024 RDC meeting it was agreed to reconvene the RDC for a review of the Informed Go Live process for **Unlocking CER benefits through flexible trading arrangements**
- The purpose of this workshop is to:
 - Develop an aligned RDC position on the FTA go-live date taking account of industry feedback and the overall reform implementation roadmap, to provide advice to the AEMC to inform their Final Determination.
 - If an aligned position is not possible, then provide RDC advice to the AEMC that articulates the key factors/risks for the AEMC to take into account when determining the FTA go-live date.
- The workshop and the RDC’s role is focused on implementation schedule/date. The purpose of the workshop is not to:
 - Debate the merits of the policy/rule, this is the responsibility of the AEMC
 - Review and provide feedback on AEMO’s HLID document. AEMO has received valuable participant feedback and will take account of this feedback in parallel.



3. HLID overview

Summary of draft changes

Flexible trading with multiple energy service providers at large customer premises

- The proposed changes would enable large customers to establish secondary settlement points and engage multiple energy service providers to manage flexible resources at these points.

Opportunities to optimise CER flexibility for small customers

- The proposed changes would enable small customers and their agents (i.e. retailers and aggregators) to identify and manage flexible CER separate from inflexible or passive energy use and would allow flexible CER to be better recognised in the energy market.

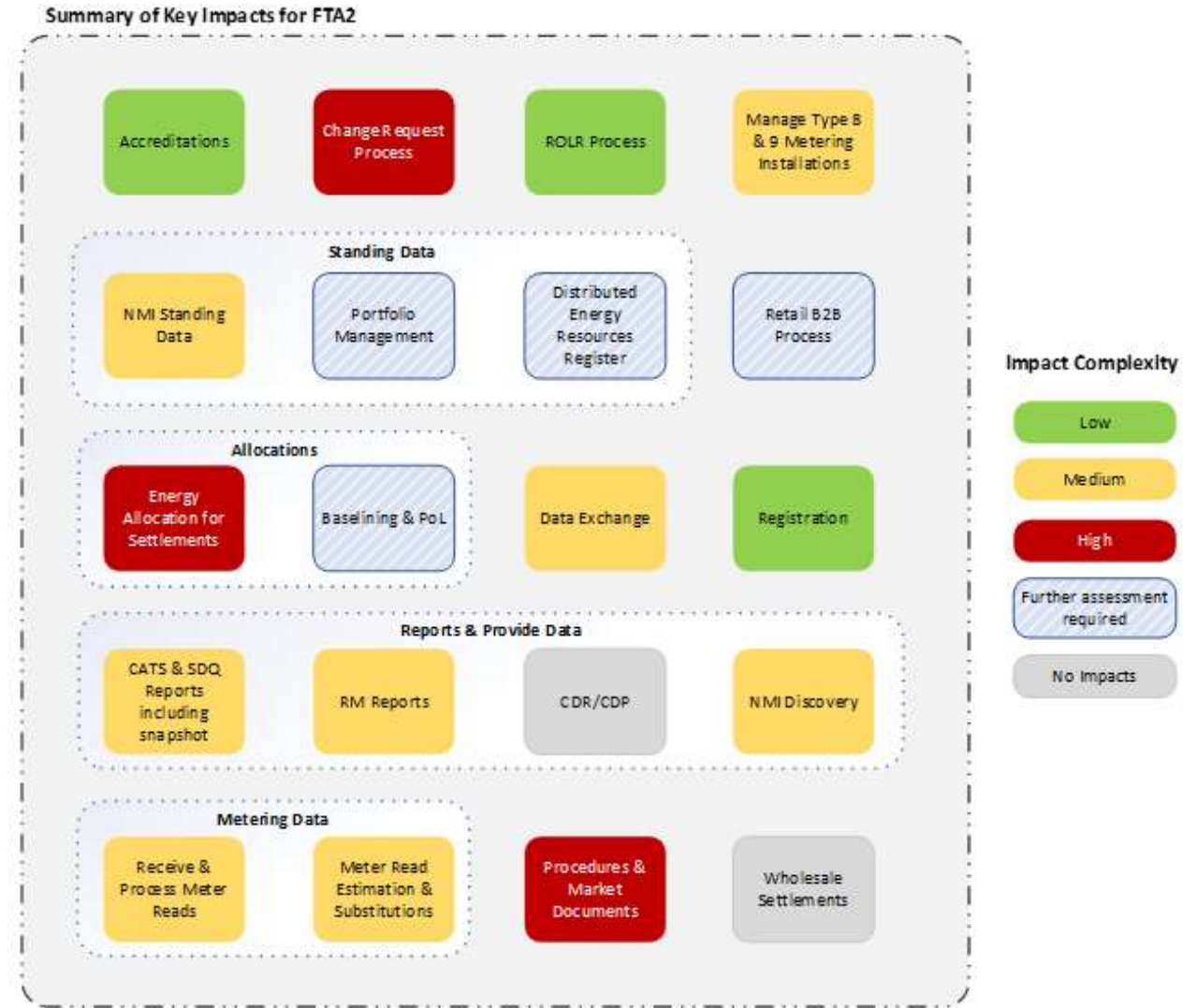
Measuring energy flows from in-built technology (e.g. streetlights, EV chargers, other street furniture)

- The proposed changes introduce arrangements for two new meter types in the NER that enable technology with in-built measurement capability to be used for settlement and billing.

Rule Change Heat Map

Figure 5 Heat Map view of key impacts of the rule change

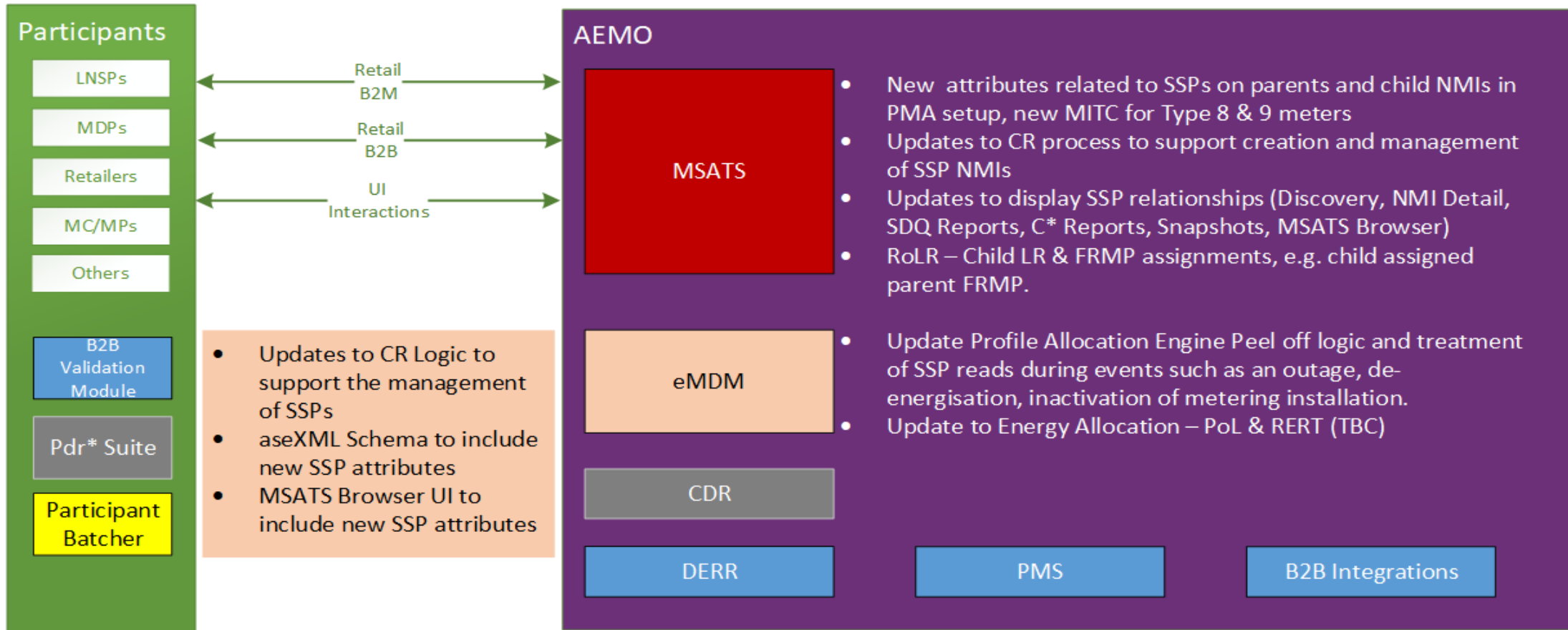
An overview of key impacts resulting from the rule change have been drafted



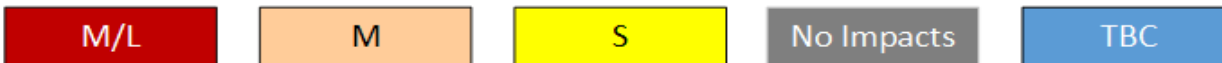
Procedures impacted

Procedure	Impact	Procedure	Impact
Registration Overview	Low	Metrology Procedures and Unmetered Loads	
Metering and Retail		Metrology Procedure Part A	High
Glossary and Framework Overview	Low	Metrology Procedure Part B	High
Market Settlement and Transfers Solutions		Unmetered Load Guideline	Medium
MSATS Procedures – CATS	High	Guidelines for the Clarification of the National Measurement Act	Low
MSATS Procedures – WIGS	High	Accreditation and Registration	
Standing Data for MSATS	High	Accreditation Checklists (MP, MDP & ENM)	Medium
Meter Data Management (MDM) Procedures	Medium	Guide to the Role of the MC	Low
NEM RoLR Processes	Low	Business to Business Procedures (IEC)	
Metering procedures, guidelines and processes		Customer and Site Details Notification Process	Low
Service Level Procedure ENM Services	Low	Meter Data Process	Low
Service Level Procedure MDP Services	Low	One Way Notification process	Low
Service Level Procedure MP Services	Low	Service Order Process	Low
National Metering Identifier procedure	High	Technical Delivery Specification	Low

AEMO Systems Heat Map



Legend: Complexity T-Shirt Sizes



Indicative high-level impacts

The information presented here is general in nature. AEMO encourages industry participants to undertake their own due diligence to assess energy market reform impacts on their respective organisations.

INDICATIVE FUNCTION	AFFECTED PARTICIPANTS									
	FRMP	LR	LNSP	ENM	MC	MP	MDP	DRSP	RECs	
NMI Creation (secondary settlement point)	✓		✓	✓	✓	✓	✓			
Retailer Assignment	✓	✓	✓	✓	✓	✓	✓			
NMI Discovery	✓		✓							
Installation and Malfunction (type 8)	✓				✓	✓	✓			
Installation type 9 single measurement device					✓	✓	✓			
Public lighting	✓		✓			✓	✓			
MC Appointment	✓				✓					
Energy Allocation	✓	✓	✓	✓						
Reports	✓		✓	✓			✓			
aseXML	✓	✓	✓	✓	✓	✓	✓			
Service Orders	✓	✓	✓	✓	✓	✓	✓			
Accreditations						✓	✓			
Distributed Energy Resources Register (DERR)			✓						✓	

Assumed Impact Level: ✓ - High ✓ - Medium ✓ - Low

4. Feedback received and recommendation

4.1.1 Industry feedback on implementation design

Key themes in feedback

- Broadly support AEMO's high-level assessment of the impact on market procedures, system and data exchanges arising due to the draft rule.
 - Some participants asked detailed questions of the high level implementation design.
 - A participant suggested that flexible trading arrangement information should be made available through the DERR to MDP/MCs.
 - Detailed questions were raised regarding public lighting, unmetered supplies and impacts on metering providers.
 - Request for further information regarding high / medium / low rating criteria of impact assessment.

4.1.2 Industry feedback on implementation milestone dates

Key themes in feedback

- Some participants suggested a later delivery timeframe than that proposed by AEMO, ranging from May 2026 to July 2027, with most proposing delivery in calendar year 2026. Some participants suggested in their feedback:
 - That procedure consultation may take longer than suggested, specifically considering potential contention within the B2B working group.
 - A higher severity of industry delivery risk than assumed.
 - Market trial preparations and industry test timeframes.
 - Further consideration of impact of parallel delivery of accelerated smart meter deployment and AEMO foundational initiatives such as IDX.

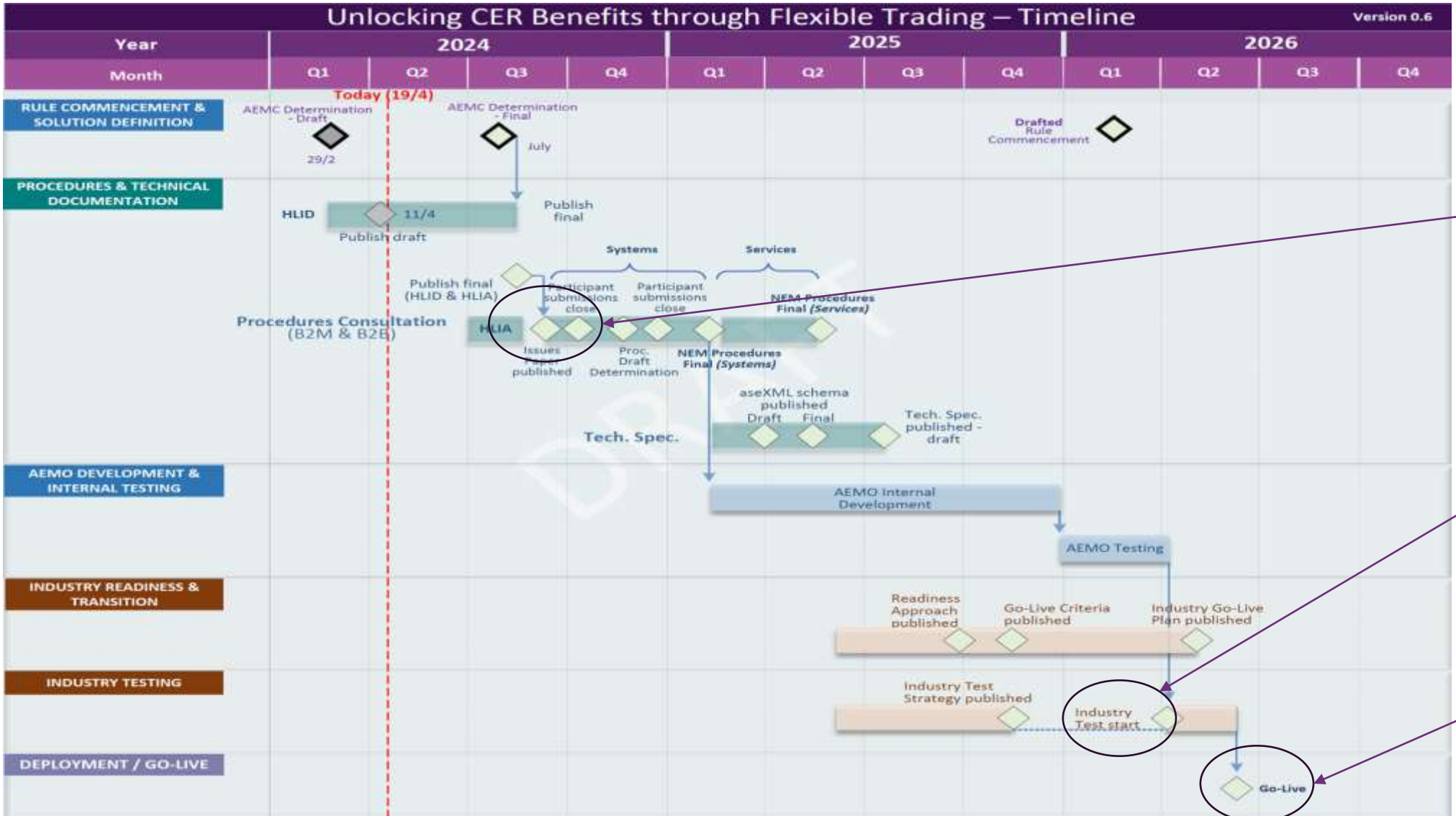
4.1.3 Industry feedback - other

Key themes in feedback

- Participants suggested that implementation risks could be better articulated, and mitigations presented.
- Participants reiterated the need for further B2B working group engagement.
- One participant asked whether a participant sandbox environment could be provided, similarly to IESS.

AEMO Indicative Timeline

Considering the feedback received based on impact assessment of the draft rule change determination and AEMO's draft HLID, November 2026 is AEMO's recommendation for rule commencement date to reduce delivery risk & costs.



Proposed amendments to AEMO's draft HLID timeline

Proposal: Additional window to allow 4 weeks for final HLID/HLIA after final rule, and additional time prior to Issues Paper for B2M & B2B consultation preparation (including any industry sessions)

Proposal: Allow 1 month for market trial setup, confirm 3-month market trial (4-month window in total)

Proposal: commencement shifts to November 2026

4.2 Implementation date advice

For the commencement date for Unlocking CER benefits through flexible trading arrangements AEMO recommends:

- AEMC nominated in their draft determination: 2 February 2026
- AEMO recommended in the initial draft HLID: May 2026
- Following feedback, AEMO’s preferred date: 2 November 2026
 - Further time to assess final rule and develop B2M & B2B procedure changes through window for HLID/HLIA and pre-consultation preparation activities
 - Allows for 1-month Market Trial setup and Market Trial 3-month window.
 - Aligned with proposed twice-yearly releases (~May and ~November) to enable efficient planning and delivery windows for industry.
 - Adequate window for mid-2025 changes such as Metering Service Review (MSR).
 - Support for participant development lead times and trials.
 - Avoids duplicate test environments needed to be maintained for non-standard releases increasing costs.
 - Clears any concerns between commencement date and annual 1 July industry tariff and consumer activities.
- AEMO notes high risks arise the further into the future the initiative occurs (such as some suggestions of pushing into 2027) including:
 - Congestion from other reforms occurring concurrently
 - Design changes may be affected by new technology requirements
 - Increasing costs through supporting resources for longer periods (e.g., staff, test environments, etc)

Request of the RDC

That the RDC supports providing advice to the AEMC on a preferred FTA go-live date of 2 November 2026 as set out above, noting:

- The AEMC is the final decision maker for the commencement date of the final rule
- AEMO will develop a final HLID informed by AEMC’s final rule determination
- Implementation milestones and timings to be confirmed with NEM Reform stakeholders via PCF following final HLID publication.

5. Next steps

Next steps



1. AEMO to share summary of this RDC meeting with the AEMC.
2. AEMC to use outcomes of this session to help inform their final rule commencement date.
3. Final rule publication date is expected 11 July 2024.
4. Consideration of room for improvement in the Informed Go Live process. Feedback from RDC members welcome via NEMReform@aemo.com.au.

6. Meeting close



For more information visit

aemo.com.au

Appendix A

AEMO Competition Law Meeting Protocol

AEMO Competition Law Meeting Protocol

- AEMO is committed to complying with all applicable laws, including the Competition and Consumer Act 2010 (CCA). In any dealings with AEMO, all participants agree to adhere to the CCA at all times and to comply with appropriate protocols where required to do so.
- AEMO has developed meeting protocols to support compliance with the CCA in working groups and other forums with energy stakeholders. Before attending, participants should confirm the application of the appropriate meeting protocol.
- To access the full protocol at AEMO's website, visit: <https://aemo.com.au/en/consultations/industry-forums-and-working-groups>

Appendix B

Glossary

Glossary

Definition	Description	Definition	Description	Definition	Description
AEMC	Australian Energy Market Commission	eMDM	Enterprise meter data management	MSATS	Market Settlements and Transfer Solutions
AEMO	Australian Energy Market Operator	EN	Embedded network	NEM	National Energy Market
B2B	Business-to-business	ENM	Embedded network manager	NER	National Electricity Rules
B2M	Business-to-market	ESB	Energy security board	NMI	National Metering Identifier
CATS	Consumer administration and transfer solution	EV	Electric vehicle	PAE	Profiling and allocation engine
CDP	Consumer data platform	FRMP	Financially responsible market participant	PMS	Portfolio management system
CDR	Consumer data right	FTA	Flexible trading arrangement	PoL	Predictability of load
CER	Consumer energy resource	IEC	Information Exchange Committee	RERT	Reliability and Emergency Reserve Trader
CP	Connection Point	IRP	Integrated resource provider	RoLR	Retailer of last resort
CR	Change request	LNSP	Local network service provider (includes DNSP, TNSP and ENM)	SDQ	Standing Data Quality
DER	Distributed energy resource	LR	Local retailer	SSP	Secondary Settlement Point
DERR	Distributed energy resource register	MC	Metering Coordinator	TNSP	Transmission Network Service Provider
DNSP	Distribution network service provider	MDP	Metering Data Provider	UI	User Interface
DRSP	Demand response resource provider	MP	Metering provider	WIGS	Wholesale, Interconnector, Generator and Sample