

3 March 2021

Ms Anna Collyer
Chair
Australian Energy Market Commission
Sydney South NSW 1235

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By online submission

Dear Ms. Collyer

Review of the regulatory framework for metering services (EMO0040)

The Australian Energy Market Operator (AEMO) welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) Review of the regulatory framework for metering services in the National Electricity Market (NEM) (Consultation Paper) published on 3 December 2020.

AEMO is keen to work with the AEMC to identify opportunities and assess potential solutions, which could improve the framework for metering services in the NEM through this review. Whilst AEMO has no specific responses to the questions raised in the AEMC's consultation paper, the following matters are highlighted for the AEMC's consideration as they relate to the operation of the metering framework:

- Technical improvements and clarifications in Schedule 7 of the National Electricity Rules (NER) – Over time, AEMO has liaised with participant and provider groups who are required to interact and comply with Schedule 7 of the NER. As a result of various AEMO led reviews, for the most part in collaboration with NEM accredited Metering Providers, technical improvements and clarifications have been identified within the Schedule. Proposed changes with annotations referring to their provenance are provided in Appendix A to this letter.
- Other minor amendments to Schedule 7 of the NER – Resulting from the MSATS Standing Data Review, conducted by AEMO in consultation with interested parties in 2020, minor amendments are proposed to Schedule 7 of the NER. Proposed changes are provided in Appendix A.
- Access to National Metering Identifier (NMI) Standing Data – AEMO considers that the provisions of NER 7.15.5(e) might be unnecessarily limiting. The current drafting provides that a retailer may access and receive NMI Standing Data. Other market participant roles, such as a Market Small Generation Aggregator, might also benefit from access to NMI Standing Data in order that they can be similarly informed as a retailer when seeking to offer services to a customer at a connection point.

Should you wish to discuss any of the matters raised in this submission, please contact Kevin Ly, Group Manager Regulation on kevin.ly@aemo.com.au.

Yours sincerely



Tony Chappel
Chief External Affairs Officer

Attachment A: Metering framework review (Proposed amendments to Schedule 7 of the NER).