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Submission to the AEMC's Draft Determination on Improving life support processes (RRC0064)

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Intellihub welcomes the opportunity to provide feedback on the AEMC's draft determination on Improving life support processes (RRC0064).

Intellihub is an Australian and New Zealand based digital energy management specialist that is simplifying the transition to sustainable energy through our holistic ecosystem of smart devices and services. We deliver innovative metering, data and behind the meter solutions that maximise digital and new energy services. We are an experienced and leading provider of multi-utility services across electricity and water networks for residential, commercial and industrial, embedded network and solar metering customers. We specialise in asset management, installation, financing, and the day-to-day operations of smart meters, managing more than 3 million advanced smart meters.

Intellihub is registered as an Embedded Network Manager (ENM) in the Australian National Electricity Market and our feedback primarily focuses on ENM related matters.

We suggest the on-market retailer notifies the EENSP directly in all scenarios

The AEMC has proposed that on-market retailers notify the Exempt Embedded Network Service Provider (EENSP) of life support registrations, de-registrations and updates to enable appropriate protections for life support customers within an embedded network. Notably, the draft determination proposes where an ENM exists the on-market retailer is to notify the ENM and the ENM must notify the EENSP and where an ENM does not exist the on-market retailer is to notify the EENSP directly.

We agree that life support customers within an embedded network should be afforded the same protections as life support customers directly connected to a regulated distribution network. However, we disagree with the proposal to involve the ENM in this process because the ENM is not adding any value and is merely acting as an intermediary, delivering information from the on-market retailer to the EENSP. Including the ENM in this process creates additional complexities for on-market retailers as they will need to have different processes depending on whether an ENM exists or not. Further, having the ENM involved adds additional time to the process which will delay protections for the life support customers. Another consideration is the cost that will be imposed on ENMs if B2B transactions are used for the communication as most ENMs do not currently utilise the B2B e-Hub. Alternatively, if email is used for the communication then sending the email directly to the EENSP would be more effective.

We believe a simpler approach, whereby the on-market retailer always notifies the EENSP, regardless of whether an ENM exists or not, would remove these complexities and allow life support information to be communicated without delay. We note that such a process aligns with the AEMC's final recommendation in their market review called Updating the regulatory frameworks for embedded networks[1].

We understand that the rationale for involving the ENM in the process is to help bridge a gap where the retailer may not be able to easily determine who the EENSP is and the EENSP's contact detail. In light of this, we propose an alternative approach that addresses this gap and makes the process more effective. Specifically, we propose the EENSP contact information be recorded in MSATS,

[1] https://www.aemc.gov.au/market-reviews-advice/updating-regulatory-frameworks-embedded-networks

enabling retailers to easily access and use this contact information for communicating life support information to the EENSP. This proposal does not involve storing information about the life support customer in MSATS, which we acknowledge is not being considered.

For context, all on-market child connection points must be registered in MSATS and AEMO requires certain information from the LNSP and ENM[2] as a prerequisite. This information includes the name of the EENSP, the location of the embedded network and a unique code generated by the LNSP to identify the embedded network (the Embedded Network Code). AEMO populates this information in a table in MSATS (Embedded Network Identifier Codes table) and makes it visible to all market participants. The Embedded Network Code is a primary key information in this table and is used to link the parent NMI and child NMI(s) in MSATS.

Under this alternative approach, AEMO would enable the EENSP contact information, such as email address and phone number, to be populated and maintained within the Embedded Network Identifier Codes table in MSATS for the purpose of life support notifications[3].The EENSP would be required to populate and maintain this contact information, include populating existing records in MSATS as a transitional activity, and we suggest this be captured in the AER's Network Exemption Guideline[4]. Under this approach when an on-market retailer needs to communicate life support information to the EENSP, the on-market retailer can:

1. Identify the Embedded Network Code for the NMI (this is one of the standing data for the NMI which the retailer currently already has access to)
2. Access the Embedded Network Identifier Codes table in MSATS (which the retailer already has access to)
3. Identify the relevant EENSP and their contact details (this is the additional information to be populated and maintained in MSATS) via the Embedded Network Code
4. Communicate life support information directly to the EENSP via email

Retailers would be able to automate this process as the EENSP contact details would be available electronically in a consistent and structured format.

This alternative approach would work for all on-market child connection points, regardless of whether there is an ENM or not, and across all NEM jurisdictions including Victoria. We also believe this approach is achievable within the proposed timeframe because the AEMC's final determination is planned to be published in June 2026 and the rule commencement date is December 2027 which provides approximately 17 months for AEMO procedure changes and for AEMO and industry to design, build and test any required system changes.

We would be happy to provide further detail on the matters raised in this submission. If you have any questions please contact Dino Ou, Industry Development Lead, at dino.ou@intellihub.com.au or (02) 8303 4033.

[2] Clause 4.12 of the MSATS Procedure

[3] We believe having the EENSP's contact information in MSATS should not be controversial because MSATS already capture participant contact information. Note, we are not proposing the EENSP become market participants however they should be allowed to maintain contact information, for the purpose of life support notifications, in MSATS so it can be discoverable to the retailer.

[4] Only AEMO can update this table in MSATS so the EENSP will need to contact AEMO directly or via their nominated ENM. We suggest Condition 1.10 of the AER's Network Exemptions Guideline be updated to obligate the EENSP to maintain contact information for the purpose of life support notifications with AEMO

Regards,

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