11 Apr 2024

GPO Box 2603
Sydney South NSW 2001

Submitted via AEMC website.

Dear Lisa and team,

ERC0346 – Unlocking CER Benefits through Flexible Trading – Draft Rule Determination

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (**AEMC**) Draft Rule Determination - Unlocking CER Benefits through Flexible Trading – ERC0346.

PLUS ES is a registered Metering Co-ordinator (**MC**) and an accredited Metering Provider (**MP**) and Metering Data Provider (**MDP**) in the National Electricity Market (**NEM**). Our skilled, workforce provides metering services across Australia, and supports Consumer Energy Resources (**CER**) deployment and infrastructure within the energy landscape. Our customers range from small residential customers through to Australia's largest manufacturers and mining operators.

With the increasing uptake of CER, PLUS ES recognises that there are opportunities to unlock benefits for consumers, whilst simultaneously achieving an effective technical integration of CERs in the market.

PLUS ES's key recommendations are:

- **Metering of second settlement points and street furniture**: Current Type 4 metering installation components should remain applicable, and the minimum services specifications tailored to the requirements of the CER or street furniture, especially where the metering device will be measuring bidirectional flow and/or the data will be used for market settlements and billing. Equally, roles and responsibilities should also ensure market data integrity is maintained. Additionally, we support that limiting the proposed new meter types to one meter type and including capacity limits can create a more efficient and sustainable industry that is better equipped to meet the needs of customers and stakeholders;
- **Reducing cost and barriers to deliver operational efficiencies**: Efficiencies gained by streamlining processes and mitigating barriers, when managing sites with General Light and Power (**GLP**) and CER arrangements or street furniture;
- **Customer opt–in to the proposed CER arrangements**: Enabling the customer to

voluntarily decide to engage in energy management practices that can lead to cost savings and environmental benefits will increase social licensing. It will also allow the energy landscape to mature by increasing the saturation of smart metering and customer awareness, encouraging technological advancements, and promoting competition and market liberalisation;

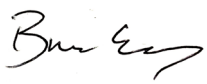
- **Jurisdictional support is required**: Via regulations, policies, and standards to promote national harmonisation, innovation and efficiency and provide guidance. They should complement the national rules; and
- **Proposed Effective Date**: PLUS ES proposes changing the effective date from February 2026 to November 2026 due to the ambitious timeline and constraints caused by other industry activities and limited resources.

PLUS ES feedback has been provided in the accompanying appendices as follows:

- Appendix A – General feedback
- Appendix B – Answers to the consultation questions
- Appendix C – Feedback on specific NER/NERR clauses

In addition to the detail provided in the appendices below, PLUS ES would welcome further discussions in relation to this submission or any other item relating to CER. If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at Helen.vassos@pluses.com.au.

Sincerely,



Bruce Sweeney
Acting Group Executive of Distributed Services and PLUS ES

APPENDIX A – GENERAL FEEDBACK

PLUS ES provides the following for the AEMC's consideration.

Detail included in the Proposed rule change

PLUS ES found it somewhat challenging to develop feedback on the Rules consultation process due to ambiguity in some of the proposed changes. These ambiguities resulted in various interpretations or raised further questions, as also evidenced at AEMO's Draft High Level Implementation Design (**HLID**) meeting held 5 Apr 2024. This can often hinder stakeholders' ability to provide meaningful input.

Providing more detailed information in the proposed Rule changes, including specifics such as metering specifications that are typically included in the National Electricity Rules (**NER**), could have aided the review process. Deferring important details to future AEMO determinations created uncertainty and made it difficult for stakeholders to fully understand the implications of the proposed changes.

Additionally, if AEMO's HLID was available for review, it may have helped to clarify any ambiguities and provided stakeholders with a better understanding of how the proposed changes will be implemented. This may have assisted to align stakeholders' interpretations and expectations, leading to more productive and efficient feedback and submission process.

Introducing Type 8 & 9 metering

- Reviewing the downstream impacts of the proposed rule changes of this consultation, PLUS ES is concerned that introducing Type 8 & 9 meters, as currently defined, will:
  - Introduce market operational complexities; and
  - Deliver poor customer experience, especially by using the small/large customer definition as eligibility criteria.

  Additionally, in some instances, 'behind-the-meter' (**BTM**) CER could have a greater consumption and/or generation than the premises GLP meter. Hence, we recommend that consideration is given to limiting the proposed new meter types to one meter type[1] and/or include capacity limits[2] to mitigate the above-mentioned impacts.
- Metering specifications – Metering specifications must be included in the Rules, to provide the industry clarity and a set of minimum capability requirements for these assets, as they are for

[1]Will reduce complexity and streamline processes within the industry.

[2]Including capacity limits in the new meter type will help ensure that the resources are allocated effectively and efficiently. See our response to Appendix B, Question 1 for further detail.

Type 4. AEMO procedures should complement the Rules and provide the detail to ensure efficient market operations with respect to these assets.

- Metering Roles – The MC, MP and MDP obligations for these meter types need to ensure the integrity of the market is maintained. In determining those obligations, the following need to be considered to ensure the commercial viability of the metering roles:
  - Use case of the metering;
  - The metering technology utilised;
  - The consumption/generation of the metering;
  - Asset owner - especially for BTM CER, where a customer may provide and/or install the asset; and
  - The MC, MP, MDP must have enabled pathways in meeting their obligations.

Reducing cost and barriers to deliver operational efficiencies

Introducing multiple FRMPs and/or metering service providers at a connection point introduces complexities, barriers, and dependencies on third parties, which increase the cost to serve.

PLUS ES recommends that the Rules and AEMO Procedures consider the use case application of the new metering type and the secondary settlement point and ensure that market participants are enabled with tools to mitigate barriers and unnecessary cost in the management of CER through flexible trading.

Customer opt–in to the proposed CER arrangements

PLUS ES supports the initiative to have the customer decide to voluntarily participate in flexible trading as it will promote social licensing. To achieve an uptake to deliver the benefits of flexible trading, it is essential to increase the scope beyond regulatory and legal requirements. There is a need to engage with the customer and the community to raise awareness, demonstrate the value of flexible trading and offer incentives. This needs to be driven by the industry, irrespective of the market role, including governments, to ensure the energy landscape benefits and customer energy savings are realised.

Effective date

PLUS ES recommends that the effective date for the proposed rule is amended at a minimum to November 2026. We have adjusted our delivery cycle to May/November cycles, aligned with market practices, and would prefer not to continually introduce other break out delivery patterns, as this causes inefficiencies. We also believe the changes are significant and the associated process/procedure impacts need to be considered to ensure efficient operational transition and

positive customer outcomes.

Several references have been made to commercial agreements and these also have a dependency on the finalisation of the Market procedures and sufficient time to allow their development and execution.

Additionally, the industry is undergoing change fatigue with the current inflight and imminent parallel initiatives and finite resources. For example, within eight months of the current proposed date (February 2026) the below initiatives, to name a few, will be happening simultaneously; that is, either in development, implementation, or post implementation delivery cycles:

- Unlocking CER
- Ramp up of Acceleration of smart meter implementation
- Power Quality Data
- AEMO FaSI
- DER Register
- BAU Retail Procedures
- Operational BAU Enhancements.

Definition of premises

The use of the term 'within the premises' could be problematic and needs further clarification. The use of the word 'within' implies some sort of structure. Yet an EV charger will often be installed on an outside wall or even stand alone in a customer's property which could not be interpreted as within the premises.

As an example, a residential customer makes an application to install their Electric Vehicle (**EV**) charger outside their premises, such as a distribution pole, due to real estate accesses. They have been provided all the required approvals. Under the proposed changes, it is not clear what type of metering the Electric Vehicle Charging Infrastructure (**EVCI**) must comply with.

NMI Standing data access (flow of information)

With the introduction of multiple FRMPs and/or Metering Roles due to secondary settlement point arrangements, the Rules need to ensure that impacted parties have access to required NMI Standing data or market information which could impact their services, e.g. planned outage notifications, NMI status of settlement points, etc.

Reading the draft determination, assumptions have been made which need to be stress tested. For example, just because the customer is the same entity for the connection point and the secondary settlement point, it does not automatically mean the customer will a) be aware of upstream/downstream procedural impacts to multiple participants and/or b) remember to notify the secondary impacted party. Placing a dependency on the customer will introduce operational inefficiencies, especially where this could be mitigated by existing market mechanisms.

Amendments to the testing specifications

PLUS ES references changes made in the NER with respect to accuracy requirements of metering unrelated to Type 8 & 9 metering or Unlocking CER Benefits through flexible trading. Details included in the draft determination references a Meter Testing Review and recommendations of the Metering Working Group. It is our understanding that whilst conversations have occurred over the years, they were not specific to a Meter Testing review. We also support that any changes beyond the scope of Type 8 & 9 meters would have been more appropriately incorporated in the scope of the Accelerated Smart Meter Deployment Draft Rules.

APPENDIX B – ANSWERS TO THE CONSULTATION QUESTIONS

PLUS ES has provided feedback in the below table, to a selection of Section 5.4[3] stakeholder consultation questions, for your consideration.

Questions	PLUS ES Feedback
Question 1: What should the flow limit be for type 8 meters (when considered per year)? Is 750 MWh per annum per connection point appropriate?	PLUS ES does not believe a volume style flow limit is appropriate, especially for the Type 8 intended use cases. • A kW capacity limit is more appropriate than a volume style flow limit for Type 8 metering. This is especially preferred where the metering is built into the CER equipment and would be very difficult to change, should energy volume limits be exceeded in the future. We are proposing nameplate limits (either import or export) of 25kW for a 3-phase connected item of CER and 8kW, (approximately one third of three phase) for a single phase connected item of CER. Equipment with a capacity rating higher than these, should no longer be considered a minor energy flow, is outside the scope of what has been intended for Type 8 metering, and can easily be metered by the existing Type 4 metering solutions; • It will be a poor customer experience if the limit is set on consumption rather than capacity, as an installation with low utilisation may be correctly set up as Type 8 which may require significant metering upgrade if their utilisation increases; and • These capacity limits should also apply to street furniture type devices metered by Type 9 metering.
Question 2: What role, if any, should Meter Providers have in installing and managing type 8 and type 9 meters?	The role of Metering Providers should only extend to the activities they perform and/or control. For example, • They are the owner of the asset especially with the inbuilt metering device; and/or • They have installed the metering device/asset, and they are collecting, validating, and publishing the metering data to market.

[3] Unlocking CER benefits through flexible trading Draft Rule determination.

	This would enable a pathway for them to ensure the integrity of the installation and metering data. The MP responsibility is for the correct installation and ongoing maintenance of NEM metering and communication, closely integrated with the MDP responsibility for the ongoing reading and data delivery to the NEM. When the meter hardware is installed by a third party, such as the customer installing a CER asset, the MP & MDP responsibilities could be met, but only if there is pre-consideration of how these responsibilities can be achieved with that hardware. For example, the metering and communications for that CER asset would have to be specified and pre-approved by the selected MP/MDP so that when they are called upon to pick up the MP/MDP task, they can do it. As an example, when an FSP/ASP currently install metering on behalf of PLUS ES MP, they are utilising a PLUS ES specified meter and communications combination, installed as per MP/MDP specification, so that it works with our head end, etc. An equivalent process, albeit suited to the CER assets and Type 8/9 metering, would need to be developed by service providers choosing to operate in this space.
Question 3: How frequently should AEMO update its specifications and procedures for type 8 and type 9 meters? Should this review be mandated?	Before considering the frequency, the initial draft of the Specifications and Procedures should already be available or should have been included in the draft NER, as they are for Type 4 metering. Without this information up front, it is not possible to fully prepare for the roll-out of the Rule Change, as this component is fundamental to the operation of the metering. As to the frequency: • AEMO should commence a review when they become aware that their procedures are a barrier to new technology; • The procedures should be generic, referencing National Measurement Institute standards and the NER, as to not require frequent updating and mitigate against the risk of a metering fleet becoming obsolete or non-compliant within a short timeframe which could leave asset owners stranded with obsolete metering; and • The procedures could possibly be governed by the same mechanism as the NER, where any responsible party can suggest a rule change to adjust the procedures to match changing technology requirements.

Question 4: Are there instances in which aggregating multiple streetlights under a single NMI via a central management system may create issues for settlement?	PLUS ES feedback on aggregating multiple streetlights: • Where each individual metered element is not going to be given a market NMI, concerns are raised on how the integrity of the aggregated NMI energy data can be maintained. How will the retailer who is required to settle the bill be sure all elements are accounted for? How will a DNSP responsible for total consumption on a feeder respond to a situation where for example a thousand streetlights are connected but accidentally left off the aggregation leading to a significant increase in unaccounted for losses? Whilst these issues exist today as unmetered supply points, the objective of enabling the sites to be metered was to mitigate current challenges; • With individual NMIs allocated, the existing data validation mechanisms can be utilised to better ensure that data for settlement is correct. Without this, the data validation method becomes invisible to the NEM, where market participants are unable to properly account for the data; and • Where streetlights are aggregated to a single NMI representing a load greater than 750MWh PA, introduces another consideration. In other circumstances, loads greater than 750 MWh would require Type 3 metering.
Question 5: Are there other use cases for type 8 or type 9 meters which stakeholders foresee in future?	Only those identified in the Draft determination – BTM CER and street furniture such as EVCI and current unmetered supplies. Any additional use cases should be consulted on by the industry via a formal consultation process.
Question 6: Are there jurisdictional requirements for DNSPs to serve as MCs for streetlights and street furniture which we should be aware of in preparing the final determination?	PLUS ES is not aware of any specific jurisdictional requirements that would mandate the DNSP to be the MC for streetlights and street furniture. Instead, the DNSP might argue that as a Network, they have better legislatively defined rights of access to street furniture for the purpose of safe distribution of electricity that would warrant them being MC as well. However other parties could do this, so long as the access rights are organised. Reiterating the MP role needs the access as well.

APPENDIX C – FEEDBACK OF SPECIFIC NER/NERR CLAUSES

The table below contains PLUS ES's feedback to specific clauses as indicated, for your consideration.

NER	
CLAUSE	**PLUS ES Feedback**
7.1.2 - Meaning of connection point in this Chapter	Amending the definition of a specific term for a select number of clauses can create ambiguity and misaligned interpretations, leading to operational inefficiencies. Reading the amended rules, 'connection point' is called out in clauses, closely followed by 'secondary settlement point' clarifying comment. PLUS ES recommends the following to streamline and mitigate any of the above mentioned outcomes: • The connection point should stay as defined in Chapter 10, maintaining consistency within the scope of the entire rules; Introduce a new term which includes a connection point and a secondary settlement point, such as 'settlement point', rather than change the definition of connection point just for Chapter 7. This is especially relevant where there is a need to clearly specify the actual network to customer connection point. One example would be where we can define a secondary settlement point as being any settlement point downstream of the connection point, without having to resort to ambiguous terms like customer's premises. Review Chapter 7 and replace 'connection point' with 'settlement point' in the instances it is applicable. This also removes the need to exclude the currently proposed definition's use, in the one clause 7.2.6.
7.2.6 - Establishing secondary settlement points within premises	There is some ambiguity surrounding the clause and PLUS ES is seeking clarification. This clause could be interpreted as an end user of a premises, such as a large customer, could have a Type 9 metering installation at the connection point.

	Whilst NER clause 7.8.3 (a) ensures that a Type 4 meter which meets the minimum service specifications is installed at a small customer's premise, there is no corresponding requirement for a large customer. For example, if the consumption or through put of the connection point is <750 MWh, what obligation is there to ensure that a large customer installs a Type 4 meter at their business premise instead of a Type 9? PLUS ES understood the introduction of Type 9 metering (lesser specifications than Type 4) was to accommodate street furniture, secondary settlement points, and technological advances.
7.3.2 (a)(3) & (b)(iii) - Role of the Metering Coordinator	There are challenges involved with a MP being nominated and remaining compliant with the obligations relating to the commissioning and maintenance of a Type 8 meter which they have not provisioned or installed. This is of concern especially when there is a civil penalty provision against the obligation. Points of consideration are: • Maintenance of an asset which has been provided by the customer and voiding of warranty; • Security and integrity of the installation and the commerciality of compliance, such as requiring a site visit is to ascertain integrity/commissioning; • Telecommunications enablement such as customer-controlled Wi-Fi; • Access to secondary settlement point assets – typically these assets are behind the meter and installed in areas where the customer needs to provide access such as inside garages, backyards etc; and • Allowances for MC, MP, MDP non-compliance due to consumer behaviour.
7.6.2 (a)(3)(ii) - Persons who may appoint Metering Coordinators	PLUS ES recommends that this clause be simplified, as per below: • Proposed definition of connection point as per clause 7.1.2 – If the definition of connection point in Clause 7.1.2 is to be maintained the additional wording is redundant, as

	connection point has been defined as the Chapter 10 definition and a secondary settlement point; or • **Proposed PLUS ES new term of settlement point (as per our feedback against 7.1.2)** – the clause could be reworded as follows: *(ii) the large customer whose premises are supplied at the connection point and any associated secondary settlement points*
7.8.1(d) - Metering installation requirements	It is not clear who has the obligation to ascertain compliance with this clause, especially when the customer has arranged the installation of an asset which they have provided. For example, the customer may install the metering device prior to accepting a retail product which would require a secondary settlement point. In these instances, for market efficiency and customer service, the retailer should ascertain at a minimum that the customer provisioned metering is compliant before signing the customer on a retail product and requesting a secondary settlement point.
7.8.1(e) - Metering installation requirements	Defining secondary settlement points within a small customer's premises could create confusion especially as applied to rental customers and strata buildings, etc. A better definition could refer to the 'non-DNSP' side of the connection point or something similar.
7.8.2(a)(1) - Metering installation components	PLUS ES has concerns with the phrasing 'no delay'. 'No delay' is a relative term and lacks specificity, particularly without a defined reference point for measurement. Additionally, when there are several components involved in the 'transportation of data', irrespective of whether the display is inbuilt or otherwise, there is a certain latency involved i.e. delay. Hence, PLUS ES have proposed alternative wording to the AEMC proposed amendments of clause 7.8.2(a)(1): 'has either a visible or an equivalently accessible display of the cumulative total *energy* measured by that *metering installation* and displayed with minimal latency[4] from the recording of the measurement; provided by means of a

[4] Where 'minimal latency' needs to be defined.

	device contained as part of the *metering installation* or, by some other means, and made readily available to the customer.'
7.8.4 - Type 4A metering installation	PLUS ES recommends additional clarification is provided regarding metering secondary settlement points and the ongoing requirement to be connected to a telecommunications network to be eligible, irrespective of the metering installation being Type 4, 8, or 9. The minimum specifications state that the installation is connected to a telecommunications network which enables remote access to the metering installation, however experience has shown a portion of customers oppose the enablement of remote access.
7.8.10(e) - Metering installation malfunctions	PLUS ES proposes that this clause should also include communication failures (faults) in addition to metering installation malfunction.[5] If access[6] to the metering on a secondary settlement point is dependent on customer contact and engagement then 7.8.10(e) should apply, irrespective of the meter type installed (4, 8, or 9). That is, the scope should not be constrained only on Type 8 metering installations provided by the customer. A customer who wishes to maintain a secondary settlement point would be incentivised to resolve the access issues, remote capabilities, and/or remediate the metering installation. If the customer is non-responsive, the secondary settlement point is made inactive, delivering a more efficient operational process.
7.15.3 - Security controls for energy data	Clarification is sought on how the obligations are met by the MC and/or MP where a meter installation has been provided by the customer and the password is the customer's Wi-Fi network password. The MC/MP has no control over the actions of the customer.
S7.2.1(d) - General	With respect to, '… and any type 8 metering installation provided and installed by or on behalf of a customer,'

[5]Required as there appears to be a difference of opinion between market operator and industry participants as to whether a communications fault constitutes a metering installation malfunction.

[6] Access to metering installations is an ongoing industry challenge today, placing a cost burden on retailers and metering providers.

	It will be challenging to apply an obligation on an MP to ensure that the metering equipment installed by the customer is appropriate, as the customer is not a party to the Rules. Key points to be considered for the Rules and AEMO procedures: • Establishment of a secondary settlement point when an existing metering device exists and does not meet the requirements; • Visibility of asset information; • Built in metering devices versus externally connected meters; • Most appropriate party[7] to provide asset information and pathway to comply with requirement; • A central database of record of compliant metering/assets; and • Maintenance and testing requirements tailored to use cases and associated technology.
Table S7.2.2.2 - Categories of registration for accreditation – 4M & 4A	Class 1.5Wh meter does not exist unless it is in reference to the old Class General Purpose meter (AS1284.1) which specified Australian electromechanical meters for Type 6, which had an accuracy target of 1.5%.
Table S7.2.2.2 - Categories of registration for accreditation – 4S	If the 4S qualification is for SMALL Type 4 metering, then the worst meter accuracy class is Class 1% kWh.
Table S7.2.2.2 - Categories of registration for accreditation – 9M	PLUS ES believe that the Class for this category should be Class 1Wh meter, as: • The present Australian Standards only have Class 1 and Class 2 meters (there is no Class 1.5); and • These meters can effectively consume a greater load from the network than the average Type 4 small customer meter and there is no reason to decrease the accuracy limit, especially when they can be installed at the connection point.
S7.2.3 (b)(4) - Capabilities of Metering Providers for metering	This will be difficult to achieve for metering installed by or on behalf of the customer. There needs to be a governance framework in place to ensure the installers develop and provide

[7] This should be the installer of the asset.

<table>
<tr><td>installation types 1, 2, 3, 4, 4A, 8, and 9</td><td>the certifications. The customer may not be aware of these requirements.</td></tr>
<tr><td>S7.4.1 (d) – General requirements</td><td>PLUS ES proposes the following for completeness:
It should include Type 3 as there are LVCT sites in Type 3 (in doing so, it also excludes HV from this allowance);
Type 8 and 9 should also be included; and
Changes to proposed wording:
For Type 3,4, 5, 6, 8 and 9 metering installations which are direct connected or have low voltage current transformer(s).</td></tr>
<tr><td>Table S7.4.3.1 - Overall Accuracy Requirements of Metering Installation Components</td><td>The below consideration relates to Type 4, 4a, 5, 8, & 9, Minimum acceptable class or standard of components, where it states: ‘…or whole current general purpose meter Wh..’.
PLUS ES proposes to remove the above mentioned wording as it only applies to electromechanical meters (Type 6) and the Standard is no longer current.</td></tr>
<tr><td>Table S7.4.3.1 - Overall Accuracy Requirements of Metering Installation Components – Type 8 Minimum acceptable class or standard of components:</td><td>PLUS ES recommends the following to align with what has been proposed in Table S7.2.2.2 Categories of registration for accreditation, for Category 8M accreditation:
1.0 meter Wh should be 2.0 meter Wh.</td></tr>
<tr><td>Table S7.4.3.7 - Type 8 Metering Installation Overall Accuracy Requirements – Annual Energy Throughput less than 0.75GWh</td><td>PLUS ES proposes the overall error allowances to be adjusted accordingly (blue), if Type 8 metering are to be defined with a Class 2kWh metering accuracy.<table><tr><th rowspan="2">% Rated Load</th><th colspan="3">Power Factor</th></tr><tr><th>Unity</th><th>0.866 lagging</th><th>0.5 lagging</th></tr><tr><th></th><th>active</th><th>active</th><th>active</th></tr><tr><td>10</td><td>3.5%</td><td>3.5%</td><td>Not used</td></tr><tr><td>50</td><td>2.5%</td><td>2.5%</td><td>3.5%</td></tr><tr><td>100</td><td>2.5%</td><td>2.5%</td><td>Not used</td></tr></table></td></tr>
<tr><td>S7.4.4 - Check metering</td><td>In the marked-up NER clauses Type 9 has been deleted. PLUS ES supports that it needs to be included.</td></tr>
<tr><td>S7.5.2 - Minimum services specification for</td><td>PLUS ES recommends:
The minimum specifications are maintained for all meter</td></tr>
</table>

type 8 and 9 metering installations	types in the same location such as the NER; and • A list of services currently exists for the Type 4 meters in the NER. A subset of minimum services should be derived for the Type 8 and 9 meters, for consistency and technology agnostic. AEMO procedures should supplement the NER clauses as per current practices.
Schedule 7.6 (b)- Inspection and Testing Requirements	Clarification is sought on how this will be achieved for customer provisioned and/or installed metering installations.
Table S7.6.1.3 – Period between Inspections	PLUS ES seeks clarification for the rationalisation of the Type 3 metering testing period requirements. By increasing the inspection obligation for Type 3 <2GWh, it will result in increased inspection costs for larger LVCT and smaller HV sites and this has nothing to do with secondary settlement points or Type 8/9 metering.
Glossary – connection point	As per our comments against Clause 7.1.2.
NERR	
29 Billing disputes (SRC and MRC) (5)(a)(ii)	Regarding the addition of 'any' meter. As per earlier comments, clarification is sought for how the MC will test a meter, when it has been provided and/or installed by the customer.
Outage and de-energisation of connection and secondary settlement point	To manage the remote enabled communications for their metering, the MP/MDP must also be a notified party of outages in addition to the FRMP and/or Distributor for premises where: • De-energisation/ supply outage of the connection point occurs; and • Remote access enabled metering exists at the connection point/secondary settlement point. These notifications should be via B2B mechanisms which could mitigate operational burdens, especially where multiple FRMPs or service providers are associated with a connection point. Having a reliance on the customer to manage the provisioning of information would result in delays, at a minimum.