# FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: PLUS ES*

***Submission Date**: 21/12/2018*

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# 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the 'Five-Minute Settlement Metering Procedure Changes – Package 1' consultation.

The changes being proposed are as a result of the Australian Energy Market Commission making a final rule to align operational dispatch and financial settlement at five minutes, starting 1 July 2021.

The Rule change requires the collection, storage and delivery of revenue metering data based on five-minute intervals for use in energy settlement, network and retail billing.

## 2. Metrology Procedure: Part A

| Section | Description | Participant Comments |
|---|---|---|
| 3.9 | The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter. | OK |
| 7 | Removal of South Australia requirement (2)<br><br>Removal of Tasmania requirement (2) | South Australia<br>The leading sentence still references the deleted clause. Delete leading sentence.i.e remove the words: *Subject to [SA](2),*<br><br>Tasmania<br>OK<br><br>General:<br><br>- Recommend consistent reference throughout the table for metering coordinator: either go with the whole word or MC. |
| 12.2 (f) | Change to clause reference | OK |
| 12.8.2 (b) | Change in section reference | OK |

## 3. Metrology Procedure: Part B

| Section | Description | Participant Comments |
|---|---|---|
| 2.6 | Update to page references | OK |
| 11.2.1 | Update to section reference to Metrology Procedure: Part A | OK |
| 11.2.2 | Update to section reference to Metrology Procedure: Part A | OK |
| 11.2.3 | Update to section reference to Metrology Procedure: Part A | OK |
| 11.3.1 | Update to section reference to Metrology Procedure: Part A<br><br>'Half hourly' reference updated to 'Interval' | OK |
| 11.3.2 | Update to section reference to Metrology Procedure: Part A<br><br>Change end dates from '23:30' to '23:55' | OK |
| 11.4 | Update to section reference to Metrology Procedure: Part A<br><br>'Half hourly' reference in formulas updated to 'TI' | OK |

| Section | Description | Participant Comments |
|---|---|---|
| | 'Half hourly' reference updated to 'Five minute'<br><br>Updates made to formulas | |
| 11.5 | Update to section reference to Metrology Procedure: Part A<br><br>Change end dates from '23:30' to '23:55' | OK |
| 11.6 | Change end dates from '23:30' to '23:55' | OK |
| 12 | New section added to detail the conversion of interval metering data, previous section 12, and following section numbering, have been changed due to this insertion | Metrology Part B Section 12 clauses are difficult to discern the exact meaning as worded. Suggest re-wording for clarity. Propose the below amendments, if that is actually the intent:<br><br>Clause 12.3 (a) – Re-word<br>For each Profile Area, the *energy* inflows are the sum of *energy* flows for all wholesale *metering installations* plus the sum of *energy* generated from any embedded generation.<br><br>Clause 12.3 (b) – Re-word<br>For each profile area, the sum of all *metering installations* that have five-minute *metering data (excluding those specified in clause 12.3 (a).* This includes *metering data* associated with *market* type 7 *metering installations*. *Metering data* for *child connection points* is ignored. |

| Section | Description | Participant Comments |
|---|---|---|
| General | Question | This clause implies SAMPLE metering data can continue to be measured and collected in either 15 minute of 30 minute intervals and will be converted to 5 minute intervals in accordance with clauses 12.1 and 12.2. Who performs this calculation? Can we assume AEMO? |
| 13.1.4 | Update to section references | OK |
| 13.2.2 | Update to section reference to Metrology Procedure: Part A | OK |
| 13.2.4 | Update to section references<br><br>Update to formulas | OK |
| General | Comment | TYPE 7 (Street Lights) to be 5 minute. |
| 13.2.5 | Update to formulas | OK |
| 13.2.6 | Update to section references<br><br>Update to formulas | OK |
| 13.3 | Update to section references | OK |
| 13.3.2 | Update to section reference to Metrology Procedure: Part A | OK |
| 13.4 | Update to section reference | OK |

| Section | Description | Participant Comments |
|---|---|---|
| 13.5.2 | Update to section reference to Metrology Procedure: Part A | OK |
| 13.5.4 | Update to section reference<br><br>Update to formulas | OK |
| General | Comment | TYPE 7 (Traffic Lights) to be 5 minute. |
| 13.5.5 | Update to formulas | OK |
| 14.1 | Update to section reference | OK |
| 14.3 | Update to section reference | OK |
| General | Comment | Provisions need to be made to support the substitution of 5 minute interval metering data where historic data is not recorded in 5 minute intervals.<br>For example, what substitution method would be used for a communications fault on the day(s) immediately following the conversion from either 15 minute or 30 minute metering? There are no historic like-for-like intervals from which to base a substitution. |

## 4. Meter Data File Format (MDFF) Specification NEM12 & NEM13

| Section | Description | Participant Comments |
|---|---|---|
| 3.3.3 | Included references to five-minute interval metering data | OK |
| 4.3 | NMI data details record (200) - Added '5' to the Interval Length field Definition | OK |
| Appendix H | Section added to include five-minute meter data file example | OK |
| General | Question | Was there a proposal to increase the order of accuracy of the metering data? If so, the character lengths specified in Appendix B need to be amended to include the additional decimal places (eg kWH = 15.4). |

## 5. Retail Electricity Market Glossary and Framework

| Section | Description | Participant Comments |
|---|---|---|
| 2.6.2 | 'Half hourly' reference updated to 'TI' | OK |
| 4.4.4 | Removal of NEM12 & NEM13 File Clarifications | OK – Needs to be removed from AEMO web site. |
| 5 | Addition of various glossary items, including those from the 'Meter Data Provision Procedure' | OK |

# 6. Meter Data Provision Procedure

| Section | Description | Participant Comments |
|---|---|---|
| 1.1 | Changes to NER clause references and minor administrative updates | OK |
| 1.2.1 | Glossary removed and now included in the Retail Electricity Market Procedures – Glossary and Framework document | Retail Electricity Market Procedures – Glossary and Framework document does not have the MDPP referenced in Table 1.3 Related AEMO Documents |
| 1.2.2 | Interpretation section removed from the document | OK |
| 1.3 | Retail Electricity Market Procedures – Glossary and Framework added as a related document | OK |
| General | Question | Was there a proposal to increase the order of accuracy of the metering data? If so, the character lengths specified in clause 4.1need to be amended to include the additional decimal places (eg kWH = 15.4). |

# 7. Other Issues Related to Consultation Subject Matter

| Heading | Participant Comments |
|---|---|
| Profiling 15 and 30-minute meter reads to 5-minute trading intervals | - |
| • What is your view on the proposed profiling approach for 15 and 30-minute non-controlled load meter reads and why? | Neither the descriptions in the Consultation Paper or the new clause 12 of Metrology Procedure Part B define the process for converting 15/30 minute metering data to 5 minute trading intervals for the purpose of settlements – Other than how it is aggregated for the purposes of calculating the NSLP. |
| • What is your view on the proposed profiling approach for 30-minute controlled load meter reads and why? | No view. The proposed approach seems reasonable. |
| • Are there better profiling options to accommodate 5MS, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented? | Assuming the five-minute load profile shape is also used to convert 15/30 minute metering data to 5 minute trading intervals, then AEMO will need to provide this profile to retailers to support settlement reconciliation.<br><br>Consideration needs to be given to locking this down well in advance of the Rev 1. |
| Meter Data Delivery to AEMO | - |
| • What are your views on AEMO transitioning to MDFF and why? | PLUS ES is fully supportive of the transition to MDFF for the delivery of interval metering data to AEMO in support of the settlement process. We see significant benefits in consolidating the meter data format for this increasing segment of the market. |

| Heading | Participant Comments |
|---|---|
| | However, PLUS ES strongly opposes any proposal to transition to MDFF for non-interval metering data. PLUS ES questions what benefit such a change would deliver considering the diminishing volume of non-interval meters.<br><br>Further, the implementation of this change for our network clients would be achieved at a significant cost. The reasoning is the inability to align automated processes based on current error codes per line for an MDM file with so far undefined error codes against a Basic MDFF file. Similar logic to that implemented and refined over many years since FRC will need to be redesigned to afford similar efficiencies in the back office for handling error conditions. |
| • What are your views on AEMO supporting the reception of register level meter data and why? | PLUS ES agrees to deliver register level metering data to AEMO providing the obligation to do so is limited to only those registers necessary to support the settlement process (ie Import and Export kWH oly).<br>PLUS ES opposes any updates to put Register Data in the Datastream Table. The Settlements processes must use the Suffix field in the Meter Register Table to avoid duplication. Industry to insist on data cleansing where appropriate values are not populated in the Meter Register table today. |
| • What are your views on MDPs sending the same files to both market participants and AEMO, energy and non-energy, and why? | In practice this will not work. As a contestable service provider servicing many clients, we find the delivery requirements can vary significantly between recipients of metering data. There are many scenarios where the file being sent to a client may not be compatible with AEMO's requirements to support the settlement process.<br><br>Our contestable competiveness would be compromised if we moved to a one file fits all approach. In a contestable situation, MDPs can have a metering service agreement directly with a customer to supply volts, harmonics or similar measures for the customer to analyse. The customer pays for this service and uses the data to improve their efficiency. This data is a service |

| Heading | Participant Comments |
|---|---|
| | between our two parties and is not necessary for settlement and should not need to be distributed to a wider audience than the party paying for the contestable service. |
| • What are the main challenges in adopting these proposed changes? How should these challenges be addressed? | MDFF (Interval)<br>The transition to the MDFF format and the integration of any newly created Event Codes associated with the delivery of data to AEMO.<br><br>MDFF (Non-Interval)<br>PLUS ES strongly opposes any proposal to transition to MDFF for non-interval metering. |