FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Flow Power*

Submission Date: *21 June 2019*

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1. Context

This template is being provided 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 2' consultation.

The changes being proposed focuses on supporting the implementation of:

- The Five-Minute Settlement (5MS) Rule

- The Global Settlement (GS) Rule

- Changes to the delivery, format and content contained in the meter data files sent to AEMO.

2. Metrology Procedure: Part A

Section	Description	Participant Comments
12.3, 12.4, 12.7	Provisions for non-contestable unmetered loads	Noted 12.7 b) If there is a major variance between physical inventory and data can we use the historical usage to get the exact usage.
12.4	Removal of 'First Tier' references	Is that also including Type 6 Basic meters?

3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2, 2.5, 3.2, 3.3.6, 3.3.8, 4.2, 4.3.3, 4.3.5, 4.3.6, 5.2.1, 5.2.6, 5.3.4, 5.3.6, 6.1, 6.2.4, 14.2.2, 14.3	Provisions for embedded network local retailers (ENLR)	Noted
6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4, 13.2.1, 13.3.1	Provisions for non-contestable unmetered loads	Noted
11.1.2, 11.1.3, 11.2.2, 11.2.3, 11.3.1, 11.3.2, 11.3.3, 11.4, 11.5, 12.3, 12.4	Removal of 'First Tier' and 'Second Tier' references	Noted
11.2.1	Removal of 'Local Retailer (LR)' references	Noted

Section	Description	Participant Comments
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	Noted
11.4, 12.3	Provisions for 'bulk supply'	Noted
12.4	Provisions for UFE (unaccounted for energy)	Please include some instructions on how UFE will be calculated.

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	Noted

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	Noted

3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	Noted
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	Can we add that Type 6 will be excluded from 5 minute reads unless changed to COMMS.
3.2.15, 3.2.16	Provisions for 'bulk supply'	Noted
3.2.15, 3.2.16, 9.2, 9.3, 9.4, 9.5, 9.6, 9.8, 9.9, 9.10	Provisions for embedded network local retailers (ENLR)	Noted
3.2.16,	Removal of 'Local Retailer (LR)' references	Noted
6.3, 6.4	Removal of aseXML csv payload tag reference	Noted
9.5	Removal of MDM RM14 MDP Data Version Comparison report	Noted
9.6	Removal of MDM RM15 Multiple Versions report	Noted

| 9.9 | Removal of MDM RM18 Electricity Interval Data report | Noted.Could you include in the document that AEMO will provide a weekly report for missing data, as previously proposed?

We understand the weekly report will include the below RM reports-

RM37 – High Priority Missing Data Report – for Wholesale, generator and interconnector NMI's
RM38 – DataStream Missing Data Report – DataStream level (NEM12) missing readings
RM39 – Mismatch Data Report – identifies where AEMO has received readings that do not match the standing data.

RM43 – UFE Factors by Profile Area – profile area data used to calculate UFE. |
| Appendix A | Provisions for FTP and API delivery method | Noted |

6. MSATS Procedures: MDM File Format and Load Process

Section	Description	Participant Comments
1.1, 2.2, 3.1, 3.3, 3.4, 3.5, 3.7, 3.9, 3.10, 5.2, 5.2.5, 6	Provisions for MDFF (Meter Data File Format)	Noted

1.3	Inclusion of additional 'Related Documents'	Noted
3.6	Changes to table content	Noted
3.7, 3.8, 3.9, 3.12, 4.4.1	Removal of sections, including references to netting and aggregating to 30-minute	Noted
3.8, 5.1	Changes to MDMF content	Noted
3.11	Inclusion of file size references	Noted
4	Inclusion of Meter data messaging exchange content	Noted
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	Noted

7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
Quick Reference Guide, 3.4, 3.7, 3.7.2, 4.2	Removal of Change Reason Code 1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003, 4053, 5053, 5090, 5091, 6400, 6401	Noted

Quick Reference Guide, 2.2, 2.6, 3.6, 4.2, 4.3, 4.15, 9.5, 12.8, 15.7, 16.7, 17.7, 18.8, 19.8, 20.7, 21.7, 22.7, 23.7, 25.9, 25.10, 27.7, 28.7, 30.7, 31.8, 32.7, 33, 34.7, 35.8, 36.9, 37.1, 37.5, 39.7	Provisions for embedded network local retailers (ENLR)	Noted. Embedded Network off market child customer will have a NMI assigned as proposed in the Metering focus group. ENM must start receiving CES for solar etc. The onus has come on ENM now instead of the DB.
2.9, 3.2, 4.11.2	Removal of 'First Tier' and 'Second Tier' references	Noted
3.2, 3.4, 4.15, 7.5, 11.4, 11.7, 11.8, 13.4, 13.6, 13.7, 25.9, 26.7, 29.7, 33	Removal of Local Retailer (LR) references	Noted

3.7.1, 3.7.2	Changes in table references	Noted
4.9	Addition to and modification of NMI Classification Codes	We note some iof the NMI classification codes are not included in the document. Please include all the NMI classification codes including the ones discussed in Metering focus group on 14 june 2019. In relation to, DHybrid please ensure that the wording is updated to say it will reflect solar as well as batteries.
4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	Noted
4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	Noted
Various	Updated table and section references throughout the document	Noted

8. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
Quick Reference Guide, 23	Removal of Chane Reason Code 1050, 1051, 6400 and 6401	Noted

9.7, 10.7, 11.7, 12.7, 13.7, 14.7, 15.7, 18.7, 20.7, 21.9, 22.7, 23, 25.8, 26.7, 27.1, 28.1, 28.5	Provisions for embedded network local retailers (ENLR)	Noted
5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7	Removal of Local Retailer (LR) references	Noted
Various	Updated table and section references throughout the document	Noted

9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	We agree to use the code GLOPOOL as advised by AEMO.
2.2	Provisions for embedded network local retailers (ENLR)	Noted

2.4, 7	Provisions for non-contestable unmetered loads	Noted
7, 9.3	Removal of net data and net datastream references	Noted
3, 7.2	Provisions for 'bulk supply'	Noted
7, 9.3	Removal of meter data to AEMO requirements	Noted

10. NEM RoLR Processes – Part A

Section	Description	Participant Comments
2, 4.3.2, 6.1, 11.3, 12.3	Removal of Local Retailer (LR) references	Noted
2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, Appendix 1	Provisions for embedded network local retailers (ENLR)	Noted
6.1, 12	Removal of Second Tier references	Noted

Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	Noted

11. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	Noted
2.4.1	Inclusion of 5 February 2022 reference	Noted
3.7.1	References to MDM format and MDMT transaction groups	Noted
3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	Noted
3.12.4	Provisions for MDPs to deliver AEMO all Datastreams related to settlements ready data and any other metering data configured in the metering installation to support UFE calculations	Noted
3.12.4	Changes to metering data quantity and quality requirements	Noted
3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	Noted

5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	Noted

12.   Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		Noted

13.   Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	Noted
2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage Requirements	Noted
2.6.2	Inclusion of bulk supply and/or cross boundary references	Noted. We request a new NMI classification code for cross boundary TNIs (X Boundary).

5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	Noted

14.   Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Implementing and transitioning to the changes in delivery of metering data to AEMO	
• Do the proposed changes in the applicable initial draft change-marked procedures implement the required changes in section 2.2.5 in an effective manner?	Yes
• Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new procedural requirements?	Yes rules need to be more clear around UFE
• Is including transitional arrangements in the relevant procedures the most effective way of implementing transitional arrangements? If	We request 2 reports (one in 5 minute and other in 30 minutes) for the week starting on 01/07/2021 .This is required to enable participants performing proper reconciliations. Please provide an estimate for UFE.

Heading	Participant Comments
not, what would be the preferred alternative approach?	
Non-contestable Unmetered Loads	

• How should non-market/contestable unmetered loads be processed and maintained in MSATS?
 	
  o Should non-contestable unmetered loads with photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads and why?
 	
  o Should non-contestable unmetered loads which do not have photoelectric (PE) cells be treated differently to those that do? If yes, how
	N/A

Heading	Participant Comments
should these loads be treated?	
• What should be considered in creating and assigning non-contestable unmetered NMIs in MSATS e.g. introducing a new Metering Installation Type Code (NCONUML) and why?	N/A
• What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why?	N/A
Service Levels for Meter Data Provider Services	
• Will AEMO's proposed arrangements likely result in more accurate market settlements and why?	It is difficult to assess the accuracy in the absence of UFE calculations being made available for assessment.
• What other data quality mechanisms should AEMO consider to supporting	

Heading	Participant Comments
improved accuracy in market settlements?	
Exemption Procedure: Metering Provider Data Storage Requirements	
• Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process for applying for a data storage exemption and why?	AEMO has not yet decided as to how the data will be stored for 288 intervals.