FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant:
Stanwell Corporation Limited

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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	These amendments seem reasonable and in accordance with the intent of the GS Rule.
12.4	Removal of 'First Tier' references	These amendments seem reasonable and in accordance with the intent of the GS Rule.

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)	These amendments generally seem reasonable and in accordance with the intent of the GS Rule. We do note however that an ENLR's involvement is only required where relevant (and not where the relevant connection point is not part of an embedded network).
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	These amendments seem reasonable and in accordance with the intent of the GS Rule.
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	These amendments seem reasonable and in accordance with the intent of the GS Rule.
11.2.1	Removal of 'Local Retailer (LR)' references	These amendments seem reasonable and in accordance with the intent of the GS Rule.

Section	Description	Participant Comments
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
11.4, 12.3	Provisions for 'bulk supply'	These amendments seem reasonable and in accordance with the intent of the GS Rule.
12.4	Provisions for UFE (unaccounted for energy)	These amendment seems reasonable and in accordance with the calculation of UFE under the GS Rule. We do note however that some of the elements of the UFE formula are adjusted by the DLF only.

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	These amendments seem reasonable and in accordance with the intent of the GS Rule.

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.2.15, 3.2.16	Provisions for 'bulk supply'	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
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)	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.2.16,	Removal of 'Local Retailer (LR)' references	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
6.3, 6.4	Removal of aseXML csv payload tag reference	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

9.5	Removal of MDM RM14 MDP Data Version Comparison report	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
9.6	Removal of MDM RM15 Multiple Versions report	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
9.9	Removal of MDM RM18 Electricity Interval Data report	These amendments seem reasonable.
Appendix A	Provisions for FTP and API delivery method	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

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)	Table 2 and Table 4 contradict themselves. Table 2 states the Meter Type for the MDMT Transaction Type is accumulation only. Table 4 states it is for interval and accumulation.
1.3	Inclusion of additional 'Related Documents'	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

3.6	Changes to table content	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.7, 3.8, 3.9, 3.12, 4.4.1	Removal of sections, including references to netting and aggregating to 30-minute	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.8, 5.1	Changes to MDMF content	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.11	Inclusion of file size references	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
4	Inclusion of Meter data messaging exchange content	This is a good inclusion however it would be even better if it extended to the delivery of messages to other market participants. For example, should an MDP send data to a FRMP if the data failed validation?
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
Quick Reference Guide, 3.4, 3.7,	Removal of Change Reason Code 1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003, 4053, 5053, 5090, 5091, 6400, 6401	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

3.7.2, 4.2		
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)	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
2.9, 3.2, 4.11.2	Removal of 'First Tier' and 'Second Tier' references	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
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	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

3.7.1, 3.7.2	Changes in table references	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
4.9	Addition to and modification of NMI Classification Codes	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
Various	Updated table and section references throughout the document	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

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	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
9.7, 10.7, 11.7, 12.7, 13.7, 14.7, 15.7, 18.7,	Provisions for embedded network local retailers (ENLR)	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

20.7, 21.9, 22.7, 23, 25.8, 26.7, 27.1, 28.1, 28.5		
5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7	Removal of Local Retailer (LR) references	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
Various	Updated table and section references throughout the document	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
2.2	Provisions for embedded network local retailers (ENLR)	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
2.4, 7	Provisions for non-contestable unmetered loads	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

7, 9.3	Removal of net data and net datastream references	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3, 7.2	Provisions for 'bulk supply'	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
7, 9.3	Removal of meter data to AEMO requirements	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

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	These amendments generally seem reasonable and in accordance with the intent of the GS Rule.
2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, 103.2, 105.3, Appendix 1	Provisions for embedded network local retailers (ENLR)	These amendments generally seem reasonable and in accordance with the intent of the GS Rule. We do note however that an ENLR's involvement is only required where relevant (and not where the relevant connection point is not part of an embedded network).
6.1, 12	Removal of Second Tier references	These amendments generally seem reasonable and in accordance with the intent of the GS Rule.

Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	This amendment seems reasonable.

11.   Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
2.4.1	Inclusion of 5 February 2022 reference	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.7.1	References to MDM format and MDMT transaction groups	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
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	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
3.12.4	Changes to metering data quantity and quality requirements	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	These amendments seem reasonable and in accordance with the intent of the 5MS Rule and GS Rule.

12. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		This procedure seems more relevant to a Metering Provider, as such Stanwell has no feedback in relation to it.

13. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	This amendment seems reasonable.
2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage Requirements	This amendment seems reasonable.

2.6.2	Inclusion of bulk supply and/or cross boundary references	Without a clear definition of what these terms represent it is difficult to confirm, however for this specific purpose it doesn't seem to represent a material amendment.
5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	These amendments seem reasonable.

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?	Stanwell is comfortable with the changes.
• Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new procedural requirements?	Stanwell is comfortable with the changes.

Heading	Participant Comments
• Is including transitional arrangements in the relevant procedures the most effective way of implementing transitional arrangements? If not, what would be the preferred alternative approach?	Stanwell is comfortable with the changes.
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	Stanwell has no suggestions for the calculation of non-contestable unmetered loads.

Heading	Participant Comments
photoelectric (PE) cells be treated differently to those that do? If yes, how 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?	Stanwell has no suggestions for this.
• What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why?	Stanwell has no suggestions for this.
Service Levels for Meter Data Provider Services	
• Will AEMO's proposed arrangements likely result in more accurate market settlements and why?	The proposals should result in more accuracy as all datastreams will be delivered to AEMO.

Heading	Participant Comments
• What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements?	Stanwell has no suggestions for this.
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?	The procedure seems reasonable for what it is trying to achieve.