

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *PLUS ES*

Submission Date: *15 February 2019*

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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 |
|---------|---|--|
| 3.2 | A type 4A or 5 metering installation must have an optical port that meets the AS 1284.10.2 or AS 62056.21 or a computer serial port to facilitate downloading of 90 days of interval energy data for each Datastream associated with the metering installation in 90 seconds or less. | |
| 3.5 | Jurisdictional Update | |
| 3.9 | The end of each TI must be on the hour (EST) and each continuous period of 5 | Clause (d) should be amended to include sub multiples of 5 minute. |

| Section | Description | Participant Comments |
|---------|--|----------------------|
| | minutes thereafter. | |
| 6 | Jurisdictional Update | |
| 7 | Jurisdictional Update | |
| 9.3 | Jurisdictional Update | |
| 12.2 | Jurisdictional Update | |
| 12.4 | Jurisdictional Update | |
| 12.5 | To validate that all metering data stored in the metering data services database is consistent with the energy data stored in the metering installation or the Physical Inventory (as applicable), | |

3. Metrology Procedure: Part B

| Section | Description | Participant Comments |
|---------|-----------------------|----------------------|
| 2.3 | Jurisdictional Update | |

| Section | Description | Participant Comments |
|---------|---|----------------------|
| 2.4 | Change to 'F' Metering Data Quality Flag | |
| 2.6 | Page number links replaced with section links | |
| 3.3.8 | Change to Type 18 – Alternative wording | |
| 3.3.11 | Addition of Type 21 - Five-minute Conversion No Historical Data | |
| 4.3.3 | Changes to Type 53 - Revision of Substituted Metering Data | |
| 4.3.9 | Addition of Type 59 – Five-minute Conversion No Historical Data | |
| 11.2.1 | Update to section reference to Metrology Procedure: Part A | |
| 11.2.2 | Update to section reference to Metrology Procedure: Part A | |
| 11.2.3 | Update to section reference to Metrology Procedure: Part A | |
| 11.3.1 | Update to section reference to Metrology Procedure: Part A 'Half hourly' reference updated to 'Interval' | |

| Section | Description | Participant Comments |
|---------|---|----------------------|
| 11.3.2 | Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55' | |
| 11.4 | Update to section reference to Metrology Procedure: Part A 'Half hourly' reference in formulas updated to 'TI' 'Half hourly' reference updated to 'Five minute' Updates made to formulas | |
| 11.5 | Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55' | |
| 11.6 | Change end dates from '23:30' to '23:55' | |
| 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 | |
| 13.1.4 | Update to section references | |

| Section | Description | Participant Comments |
|---------|--|----------------------|
| 13.2.2 | Update to section reference to Metrology Procedure: Part A | |
| 13.2.4 | Update to section references Update to formulas | |
| 13.2.5 | Update to formulas | |
| 13.2.6 | Update to section references Update to formulas | |
| 13.3 | Update to section references | |
| 13.3.2 | Update to section reference to Metrology Procedure: Part A | |
| 13.4 | Update to section reference | |
| 13.5.2 | Update to section reference to Metrology Procedure: Part A | |
| 13.5.4 | Update to section reference Update to formulas | |
| 13.5.5 | Update to formulas | |

| Section | Description | Participant Comments |
|---------|-----------------------------|----------------------|
| 14.1 | Update to section reference | |
| 14.3 | Update to section reference | |

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

| Section | Description | Participant Comments |
|------------|---|---|
| 3.3.3 | Included references to five-minute interval metering data | |
| 4.3 | NMI data details record (200) - Added '5' to the Interval Length field Definition | |
| Appendix B | Change of Character Lengths | Note: This amended section was missed in the Participant Response Template OK - Noting this is applicable to ALL Interval Lengths. |
| Appendix H | Section added to include five-minute meter data file example | |

5. Retail Electricity Market Glossary and Framework

| Section | Description | Participant Comments |
|---------|--|--|
| 2.6.3 | Update to TI | |
| 4.4.4 | Removal of NEM12 & NEM13 File Clarifications | |
| 5 | Updates to various Glossary items | <p>Comment. Some entries have been removed from the glossary and returned to MDPP as they are only used in that Procedure (eg 'Accumulated Metering Data – Summary Data', but, an entry has been added from the MDPP (eg 'Average Daily Load Profile').</p> <p>We should adopt a consistent approach with respect to these Glossary definitions.</p> |

6. Meter Data Provision Procedure

| Section | Description | Participant Comments |
|---------|---|----------------------|
| 1.1 | Changes to NER clause references and minor administrative updates | |

| Section | Description | Participant Comments |
|---------|---|----------------------|
| 1.2.1 | Various updates | |
| 1.2.2 | Interpretation section removed from the document | |
| 1.3 | Retail Electricity Market Procedures – Glossary and Framework added as a related document | |
| 2.3 | Update to section (d) | |
| 3.4 | Removal of 'single' | |
| 4.1 | Change to character length | |

7. Other Issues Related to Consultation Subject Matter

| Heading | Participant Comments |
|--|--|
| Profiling 15 and 30-minute meter reads to 5-minute trading intervals | No Comment |
| Meter Data Delivery to AEMO | PLUS ES supports the delivery of register level metering data to AEMO using the NEM12 file format. However:- |

| Heading | Participant Comments |
|---------|--|
| | <ol style="list-style-type: none"> 1. PLUS ES disagrees with the proposed need for the MDP to continue to have to manage datastreams for meter data delivered at a register level. PLUS ES takes this position for the following reasons: - <ol style="list-style-type: none"> a. NMI Suffixes are currently maintained in MSATS by the MPB within the NMI Meter Register table. The population of this information is mandatory. b. Obligations currently exist on the MPB and MDP to manage the accuracy and consistency of register and suffix information within the NMI Meter Register table. Refer MSATS Procedures clauses 2.4 (k), 2.4 (q), 2.5 (a) c. Obligations currently exist on the MDP to align information contained within the MDFF with MSATS (ie Register IDs). This obligation only exists for type 4, 4A and 5 metering installations, but could easily be expanded to all metering types. d. Retailers currently validate metering data supplied in the MDFF against the NMI Meter Register table. This is common practice among most retailers. e. The duplication of suffix and register information in the Datastream table is an unnecessary overhead and will likely lead to confusion and discrepancies. Quite simply, such duplication is bad practice. f. To support the proposed transitional approach, AEMO will need to validate MDFF data against the NMI Meter Register table during any period for which the datastreams remain 'Net'. This process could continue: Validate MDM against Datastream table, validate MDFF against NMI Meter Register table. |

| Heading | Participant Comments |
|---------|---|
| | <p>2. PLUS ES disagrees with placing an obligation on MDPs to provide metering data associated with reactive energy unless the supply of such metering data is required to support the settlement process. Metering data for reactive energy is collected for all WIGS and LARGE customers, and a relatively insignificant number of SMALL customers. In most cases, both import and export reactive energy flows are measured to support the network tariff. In the majority of instances, the energy measured against the import channel (K1) is zero. The inclusion of this metering data, where it is not required to support the settlement process places an unnecessary increase on the volumes of data being sent to MSATS.</p> |