

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo Energy

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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.

Items highlighted in Blue are additional comments

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.	Red Energy and Lumo Energy (Red and Lumo) support the amendments as proposed.		
3.5	Jurisdictional Update	Red and Lumo request the following is amended for clarification (consistent with the advice provided by the COAG Energy Council. <i>(b) The type 5 metering installation values of "x" applicable to a Jurisdiction as set by the Minister of each jurisdiction are specified in the following table:</i>		
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter.	Red and Lumo support the amendment as proposed.		
6	Jurisdictional Update	<p><u>Clause 6 Embedded Network and Reversion of metering Installation</u></p> <p>We note the comments provided by the COAG Energy Council. Red and Lumo request the following is amended for clarification:</p> <table border="1" data-bbox="994 1129 1944 1267"> <tr> <td data-bbox="994 1129 1167 1267"><i>Victoria</i></td> <td data-bbox="1167 1129 1944 1267"><i>Embedded network child metering in Victoria is regulated by a combination of the Victorian Orders and the NER metering competition rules.</i></td> </tr> </table>	<i>Victoria</i>	<i>Embedded network child metering in Victoria is regulated by a combination of the Victorian Orders and the NER metering competition rules.</i>
<i>Victoria</i>	<i>Embedded network child metering in Victoria is regulated by a combination of the Victorian Orders and the NER metering competition rules.</i>			

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7	Jurisdictional Update	<p><u>Victoria</u></p> <p>We note the comments provided by the COAG Energy Council. Red and Lumo request the following is added for clarification:</p> <table border="1"> <tr> <td><i>Victoria</i></td> <td><i>Metering Coordinators in Victoria are regulated by a combination of the Victorian Orders and the NER metering competition rules.</i></td> </tr> </table> <p><u>Queensland</u></p> <p><u>Clause 7(2) Meter Installation Reversion</u></p> <p>Please provide information on the legislative amendments that warrant this change.</p> <p>Further, given the AEMC are currently consulting on the reversion of a meter from Type 4 to 4A (and 4A to 4), we recommend that this clause is not amended until the finalisation of the rule change.</p>	<i>Victoria</i>	<i>Metering Coordinators in Victoria are regulated by a combination of the Victorian Orders and the NER metering competition rules.</i>
<i>Victoria</i>	<i>Metering Coordinators in Victoria are regulated by a combination of the Victorian Orders and the NER metering competition rules.</i>			
9.3	Jurisdictional Update	<p>The Queensland Electricity Connection Manual (QECM) and Queensland Electricity Metering Manual (QEMM) provide minimum requirements for connection of supply and metering of customer installations. Currently the LNSP publishes information for Electrical Contractors to completing works within their distribution area.</p> <p>With this proposed removal, who will be responsible for managing and publishing these operational requirement documents?</p>		
12.2	Jurisdictional Update	<p>AEMO has not articulated in the consultation process the legislative amendments that warrants this change, please provide this information in the final determination.</p>		

Items highlighted in Blue are additional comments

12.4	Jurisdictional Update	AEMO has not articulated in the consultation process the legislative amendments that warrants this change, please provide this information in the final determination.
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),	Red and Lumo support the amendments as proposed.
4.1	Minimum Services Specification	Red and Lumo note AEMO's response to our first round consultation response. In order to remove any ambiguity, we request that AEMO include the following within section 4.1: <i>Metering Service Standards including accuracy requirements are as defined in NER S7.4.</i>

3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.3	Jurisdictional Update	Red and Lumo support the amendments as proposed.
2.4	Change to 'F' Metering Data Quality Flag	Red and Lumo support the amendments as proposed.
2.6	Page number links replaced with section links	Noted.
3.3.8	Change to Type 18 – Alternative wording	Red and Lumo support the amendments as proposed.

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3.3.11	Addition of Type 21 - Five-minute Conversion No Historical Data	Red and Lumo support the amendments as proposed.
4.3.3	Changes to Type 53 - Revision of Substituted Metering Data	Red and Lumo support the amendments as proposed.
4.3.9	Addition of Type 59 – Five-minute Conversion No Historical Data	Red and Lumo support the amendments as proposed.
11.2.1	Update to section reference to Metrology Procedure: Part A	Red and Lumo support the amendments as proposed.
11.2.2	Update to section reference to Metrology Procedure: Part A	Noted.
11.2.3	Update to section reference to Metrology Procedure: Part A	Noted.
11.3.1	Update to section reference to Metrology Procedure: Part A ‘Half hourly’ reference updated to ‘Interval’	Noted.
11.3.2	Update to section reference to Metrology Procedure: Part A Change end dates from ‘23:30’ to ‘23:55’	Red and Lumo support the amendments as proposed.
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’	Red and Lumo support the amendments as proposed.

Items highlighted in Blue are additional comments

	Updates made to formulas	
11.5	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Red and Lumo support the amendments as proposed.
11.6	Change end dates from '23:30' to '23:55'	Red and Lumo support the amendments as proposed.
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	Red and Lumo support the amendments as proposed. We request AEMO include a detailed example that incorporates AEMO's methodology for conversion of metering data.
13.1.4	Update to section references	Noted.
13.2.2	Update to section reference to Metrology Procedure: Part A	Noted.
13.2.4	Update to section references Update to formulas	Noted.
13.2.5	Update to formulas	Red and Lumo support the amendments as proposed.
13.2.6	Update to section references Update to formulas	Noted.
13.3	Update to section references	Noted.
13.3.2	Update to section reference to Metrology Procedure: Part A	Noted.
13.4	Update to section reference	Noted.

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13.5.2	Update to section reference to Metrology Procedure: Part A	Noted.
13.5.4	Update to section reference Update to formulas	Noted.
13.5.5	Update to formulas	Red and Lumo support the amendments as proposed.
14.1	Update to section reference	Noted
14.3	Update to section reference	Noted.

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

Section	Description	Participant Comments
3.3.3	Included references to five-minute interval metering data	Noted.
4.3	NMI data details record (200) - Added '5' to the Interval Length field Definition	Noted.
Appendix H	Section added to include five-minute meter data file example	Red and Lumo support the amendments as proposed.

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
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2.6.3	Update to TI	Red and Lumo support the amendments as proposed.
4.4.4	Removal of NEM12 & NEM13 File Clarifications	Noted.
5	Updates to various Glossary items	Noted.

6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	Noted.
1.2.1	Various updates	Red and Lumo support the amendments as proposed.
1.2.2	Interpretation section removed from the document	Red and Lumo support the amendments as proposed.
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	Noted.
2.3	Update to section (d)	Red and Lumo support the amendments as proposed.
3.4	Removal of 'single'	<p>Red and Lumo note the feedback provided by Energy Queensland in response to the first stage consultation. We have concerns on the impact this may have to retailers if 'single' is removed.</p> <p>We suggest that instead of removing the obligation to provide a single metering data file that we instead include a provision that it allows for multiple files, if restricted due to file size.</p>

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		<p><i>(a) Subject to clause 3.4(b), retailers and DNSPs must provide a single metering data file in relation to a retail customer’s metering installation for the requested period.</i></p> <p><i>(b) A DNSP may provide multiple metering data files to a retailer, where required due to file size limitations.</i></p>
4.1	Change to character length	Noted.
General		<p>The proposed changes seek to allow AEMO to be a recipient of meter data files.</p> <p>Red and Lumo seek clarification on whether these procedures and the obligations imposed within them, will extend to include AEMO?</p> <p>If this change is progressed to allow AEMO to receive all energy and non-energy metering data, AEMO must update the procedures specifically address the following:</p> <ul style="list-style-type: none"> ● How would additional data be stored? ● Include provision of AEMO’s responsibility to ensure obligations under Privacy Act 1988 (Commonwealth) are met ● What confidentiality requirements would be placed on it? ● Who would have access? ● Will AEMO’s legislated indemnity apply to data that isn’t covered under the Rules or Procedures?

Items highlighted in Blue are additional comments

7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	<p>As previously stated, Red and Lumo note the efforts AEMO has undertaken in determining a profiling solution for 5-minute settlement.</p> <p><u>Further to our comments provided previously we question if this will have any impacts to meter data delivery timeframes to a retailer, specifically;</u></p> <ol style="list-style-type: none"> 1. Will the MDP's still deliver the meter data within the same time periods as they currently have to deliver, even with this additional step of AEMO processing the data to convert to 5 minute intervals? 2. Has AEMO conducted any analysis on whether this will impact the time retailers currently receive these files (should retailer expect a delay)?
Meter Data Delivery to AEMO AEMO transitioning to MDFF	<p>Red and Lumo Energy AEMO's comment to our provided feedback and questions in our first stage consultation, however, as AEMO did not respond to our questions, we again request clarification on:</p> <ol style="list-style-type: none"> 1. What validation processes and issues has AEMO considered? 2. How will the rejection process work? Who is notified? 3. Will the notification processes also be amended? If AEMO rejects a file is the FRMP notified?
Meter Data Delivery to AEMO	<p>Red and Lumo reaffirm that we do not support the reception of register level meter data and firmly believe that this must not be considered for change at this time.</p>

Items highlighted in Blue are additional comments

<p><u>AEMO supporting the reception of register level meter data</u></p>	<p>Aside from the fact that this will impose significant costs to participants, we consider that this outside of the scope of 5 Minute Settlement. AEMO has made this clear in their responses to both us and other participants in this consultation process.</p> <p>AEMO’s comment that “Active and Reactive to support AEMO’s obligation to monitor and report on UFE”. It is unclear how AEMO currently meet their UFE obligations without active and reactive data. Further, we understand that may assist AEMO under their requirements for the Global Settlement rule change. However, this is not up for consultation. As a result, we firmly recommend that this is excluded and managed in the procedure amendments to Global Settlements.</p> <p>Further, AEMO’s comments in the draft determination that states the need for this change is to also support emerging initiatives such as Distributed Energy Resources and Consumer Data Rights. It is inappropriate to implement a change based on potential future initiatives that are unclear, have not yet been finalised and outside of the scope of 5 Minute Settlement.</p>
<p>Meter Data Delivery to AEMO <u>MDPs sending the same files to both market participants and AEMO, energy and non-energy</u></p>	<p>Red and Lumo note AEMO’s feedback to our comments provided in relation to delivery of energy and non-energy data however, as stated in above response we understand AEMO has UFE obligations as part of other rule changes and not 5 Minute Settlement.</p> <p>As AEMO provided a non-descript response to our feedback. We re-provide the following questions for AEMO in relation to this change which where not clarified in our previous feedback;</p> <ol style="list-style-type: none"> 1. What information pertaining to energy or non-energy is being proposed? And for what purpose would AEMO or other market participants require non-energy information? 2. Participants currently pay through contractual agreements for the provision of non-energy data (see PlusES feedback in Stage 1) will AEMO pay for this or will AEMO share all data with the retailer also? 3. How would additional data be stored? what confidentiality requirements would be placed on it? who would have access? Will AEMO’s legislated indemnity apply to data that isn’t covered under the Rules or Procedures?

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	<p>4. How will this data be used differently to the current reporting obligation retailers have to AEMO such as Demand Side Participation and being proposed as part of the Distributed Energy Resources Guideline? Could AEMO not meet their UFE obligations from information currently being provided.</p> <p>5. What additional functions does AEMO see itself performing with the data (energy and non-energy) it receives? Will these functions be completed on a user-pays basis or will the costs of conducting these functions be paid for by all customers? How will AEMO use the additional data if not to perform additional functions?</p> <p>AEMO noted in their draft determination that there was participant support to this initiative however, the multiple concerns and questions from Metering Providers and some retailers that were not addressed. AEMO must not make a new obligation on the provision of metering data without addressing the concerns raised by participants who will ultimately bare the cost of this optional, AEMO led implementation.</p>
General	<p>We firmly object to all changes that are beyond the scope of the 5 minute settlement rule. AEMO must justify any costs associated with an expanded scope of its system build or functionality that goes beyond the scope of the changes that 5-minute settlement have been mandated to apply.</p> <p>AEMO will bear additional costs, which ultimately will be passed onto consumers, resulting from this extra unrequired functionality and enhancements that AEMO states explicitly in its consultation paper that is “not required by the 5MS rule”.</p> <p>Red and Lumo Energy request that AEMO note that all non-mandatory changes implemented as part of this project be included on the risk register as a potential impact to industry readiness.</p>

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