FIVE MINUTE SETTLEMENT – NEM Settlement Revisions Policy Change0073

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: EEQ

Submission Date: 22/02/2019

1. Potential effect of Five-Minute Settlement

This refers to section 3.1 of the consultation paper

Heading	Participant Comments
• Do participants agree with the proposed changes to the Policy in relation to 5MS?	EEQ has concerns with the transitional clause for the cut over to 5MS during a settlement week.
Are there other relevant issues that have not been considered?	
 What is an alternative approach to updating the Policy in relation to 5MS? How would it be implemented? 	EEQ preference would be for a full week of summated data and profiles at 30mins to be extended to the end of the cutover week ie 3 July 2021.

2. Potential effect of Global Settlement

This refers to section 3.2 of the consultation paper

Heading	Participant Comments
 Do participants agree with the proposed changes to the Policy in relation to Global Settlement? 	EEQ has concerns with the handling of revisions, caused by UFE, can be incorporated into the existing settlement timeframes.
Are there other relevant issues that have not been considered?	 Routine revised statements at 20 weeks should include Actual Reads from consumption meters where as preliminary and finals are expected to have a large portion of meters as estimated. For EEQ as a LR with 95% of NMIs with Type 6 metering, the expected adjustments to revisions is unquantifiable under the subtraction method so global methods may realise more than 'minor' revisions. The causal effect of consumption meters to global settlements will subsequently impact other participants revisions where estimated reads likely to be a large attributor to UFE
 What is an alternative approach to updating the Policy in relation to Global Settlement? How would it be implemented? 	Special revised statements may be required as a standard practice between R1 and R2 with consideration to extending R2 beyond 30 weeks. EEQ believes a new Policy/Clause is required to articulate a suitable process for all parties.

3. Other Amendments

This refers to section 3.3 of the consultation paper

Heading	Participant Comments
Do participants agree with the proposed changes to the Policy?	
Are there other relevant issues that have not been considered?	Open Question: If UFE is disputed and subsequently adjusted post R1, does it affect the 'Locked' NSLP?
	EEQ would welcome more details on the management of revisions under global settlement arrangements that extend over the settlement by difference timeframes.