

# JULY 2023 REMP CONSULTATION

## PROCEDURE CONSULTATION

## SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant: PLUS ES***

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## 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the July 2023 REMP consultation.

The changes being proposed are due to three ICF’s raised through the ERCF and an AEMO proposed change, resulting to changes to AEMO’s Retail Electricity Market Procedures to implement the recommended process improvements.

## 2. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
Appendix E. Reason codes	Addition of Incorrect Meter Multiplier	
Appendix E. Reason codes	Addition of Temporarily Connection Point unmetered	
Appendix E. Reason codes	Addition of Customer By-Pass	
Appendix E. Reason codes	Addition of Network By-Pass	
Appendix E. Reason codes	Addition of Transposed Channel	<p>Transposed codes would rarely get used. Typically the configurations are corrected, and Actual Data is republished.</p> <p>As there is no visibility to the qualification/impact of this requirement it is difficult to support this reason code.</p>

Metering Procedure Changes

Section	Description	Participant Comments
Appendix E. Reason codes	Addition of Transposed Channel - UoM Correction	<p>Transposed codes would rarely get used. Typically the configurations are corrected, and Actual Data is republished.</p> <p>As there is no visibility to the qualification/impact of this requirement it is difficult to support this reason</p>
Appendix E. Reason codes	Addition of Transposed Channel – Reverse Polarity	<p>Transposed codes would rarely get used. Typically the configurations are corrected, and Actual Data is republished.</p> <p>As there is no visibility to the qualification/impact of this requirement it is difficult to support this reason</p>
Appendix E. Reason codes	Addition of Transposed Meter	
Appendix E. Reason codes	Addition of Network by-pass extreme weather	<p>PLUS ES does not support this code as it is duplicating another proposed reason code/redundant.</p> <ul style="list-style-type: none"> <li>• Network Bypass is already proposed as a reason code</li> <li>• There is an existing reason code 3 – extreme weather conditions</li> </ul>
Appendix E. Reason codes	Addition of Defined load method	PLUS ES does not support this enumeration as it is a methodology ('method code') rather than a reason code.

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Section	Description	Participant Comments
		<p>Type 18 – substitution allows you to substitute with agreement. If we then use the methodology as a reason code, we lose sight of why the data has been amended. i.e. extreme weather, quarantined premises etc.</p>

### 3. Metrology Part A

Section	Description	Participant Comments
<p>5.1 Legacy Summation Arrangements</p>		<p>Suggested addition to the text to ensure that conductors are not doubled-up, whether that would be terminals in a marshalling box or in the terminals of a meter. The purpose of this is to allow access to individual instrument transformers for testing, without disturbing the integrity of any part of the secondary circuit.</p> <p>An improvement is also suggested in the wording for the termination of secondary conductors.</p> <p>5.1(c) should be modified as follows:</p> <p style="padding-left: 40px;">CT secondary circuits can only be paralleled using appropriate arrangement of links <b>terminating individual conductors</b>; this must not be done at the <i>meter</i> terminals</p>

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<p>5.2 New Metering Installation Summation Arrangements</p>	<p>Addition of new section</p>	<p>Whilst PLUS ES has not currently identified additional scenarios, it does not preclude their eventuation. For this purpose the allowed summation metering arrangements are better described in terms of objectives and conditions that must be met, so that it can accommodate variations of circumstances. If it is, instead, limited to explicit examples (as presently written), it will cause future compliance problems when these variations arise that meet the objective, but were not included on the original list of explicit examples. The following alternative is for consideration:</p> <p>5.2 could be re-written as follows:</p> <p style="padding-left: 40px;">Summation metering is only permitted for single connection point circumstances where a physical restriction prevents the installation of single current transformers over all conductors of each phase.</p> <p style="padding-left: 40px;">Any proposed summation metering arrangement must be approved by AEMO before implementation.</p> <p style="padding-left: 40px;">Examples of circumstances considered for summation metering may include HV breaker-and-a-half schemes, HV single transformer fed by multiple paralleled cables, and cross boundary supplies with multiple LV secondary circuits.</p>
<p>5.3 Summation Method</p>	<p>Addition of new section</p>	<p>While the paralleling CT method is approved, it should be (a) documented with the obligations to be designed to meet the accuracy performance requirements of the Rules and (b) alternative methods of summation should not be precluded because they may be demonstrated to be equivalent or superior to existing methods. Moreover, there is already protection against the installation of non-compliant summation systems due to the requirement for AEMO to approve <b>all</b> new summation systems prior to installation.</p>

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		<p>An improvement is also suggested in the wording for the termination of secondary conductors.</p> <p>5.3 should be modified as follows:</p> <p>These provisions detail the summation method that can be used for new summation metering installations described in 5.2.</p> <ul style="list-style-type: none"><li>(a) Summation metering <b>is can be</b> achieved by paralleling CT secondary circuits, <b>so long as</b> the overall metering installation meets the minimum standards and overall error <b>performance requirements</b> for a new metering installation under all load <b>combinations of the individual CT secondary circuits</b> conditions for the connection point and its individual conductors as measured by individual CTs.</li><li>(b) CT secondary circuits can only be paralleled using appropriate arrangements of links <b>terminating individual conductors</b>; this must not be done at the meter terminals.</li><li><del>(c) The use of additional summation CTs within the metering installation is not permitted.</del></li></ul>
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## 4. Metrology Procedure Part B

Section	Description	Participant Comments
2.6 Summary table of Substitution	Edited to include: <ul style="list-style-type: none"> <li>• Rewording of type 14, type 15 and type 20</li> <li>• Obsolescence of type 16</li> <li>• Addition of new substitution types 22,23,24,25.</li> </ul>	
3.2 Substitution types	Edit of substitution types in (f) Addition of (g) (i) and (ii)	
3.3.4 Type 14 – Like Day	Rewording to Type 14 – Retrospective Like Day	
3.3.5 Type 15 – Average Like Day	Reworded to Type 15 – Retrospective Average Like Day	
3.3.6 Type 16 – Agreed Method	Reworded to obsolete Type 16 – Agreed Method	



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3.3.8 Type 18 – Alternative	Reference for 3.2 (g)(ii) added Addition of (d)	
3.3.10 Type 20 – Churn Correction	Rewording to Type 20 – Propsective Like Day Use definition edited	
3.3.12 Type 22 – Prospective Average Like Day	New Substitution definition added Addition of table 4	
3.3.13 Type 23 – Previous Year	New Substitution definition added	
3.3.14 Type 24 – Data Scaling	New Substitution definition added	
3.3.15 Type 25 - ADL	New Substitution definition added	
11.2.1 NSW	Reference amended to 12.9.2	
11.2.2 Queensland	Reference amended to 12.9.2	
11.2.3 South Australia	Reference amended to 12.9.2	
11.3.1 NSW & Queensland	Reference amended to 12.9.2	

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11.3.2 South Australia	Reference amended to 12.9.2	
11.4.1 Net System Load Profile	Reference amended to 12.9.2	
11.4.2 Floor Value	Addition of new section in respect to the NSLP	
11.4.3 NSLP TI values below floor value	Addition of new section in respect to the NSLP	
11.5 Accumulation Meter Profiler – Net System Load Profile	Amended of reference to 12.9.2 in (a) Amended of reference to 11.4 in (c)	

## 5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
16.2 Participant	Removal of (h)	
16.2 Participant	Rewording of (i) Removal of (i) (ii)	

## 6. Service Level Procedure Embedded Network Manager Service

Section	Description	Participant Comments
4.2.1 Overview	Removal of (f)	<p>Aligned with the provisions of NER 7.15.5(c)(6) - that an ENM may access NMI Standing Data at a child connection point, not a parent connection point, PLUS ES recommends that the ENM obligations of clause 4.1 (d) NMI Allocation (ENM SLP) are updated and the sub clauses which the ENM cannot fulfill compliantly are removed. That is, assigning TNI, DLF etc., if they are not entitled to access the information, the <b>how</b> they access it is irrelevant, and hence they should not be required to populate it.</p> <p>(d) Create the Child NMI in MSATS using Create NMI Change Request 2020, 2021, 2520, or 2521. When creating the Child NMI the ENM must:</p> <ul style="list-style-type: none"> <li>(i) Assign the TNI Code<sup>2</sup> of the Parent NMI to the Child NMI;</li> <li>(ii) Link the Child NMI to the Parent NMI by assigning the same Embedded Network Code of the Parent NMI to the Child NMI in the "Child Name" field; and</li> <li>(iii) Assign the appropriate DLF Code to the Child NMI.</li> </ul> <p>Additionally, a review and update of obligations is required with respect to the CATS procedures, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Clause 4.12 (e) and (f) – Provisioning of Parent NMI</li> <li>• Clause 9.2.4(c) – Provisioning of parent NMI fields as a 'must' in CRs</li> <li>• Clause 9.2.4 (c) – Provisioning of parent NMI fields as a 'must' in CRs</li> <li>• Clause 12.2.5 (b) - Provisioning of parent NMI fields as a 'must' in CRs</li> </ul>

## 7. Additional Feedback

### Participant Comments

**Access data rights** – PLUS ES recognises the constraints the Rules present from a compliance perspective. Resolution/remediation of BAU tasks which require access to information no longer available, have ceased, in the absence of alternative compliant mechanisms, resulting in poor customer outcomes. Whilst a rule change is an evident requirement, it does not appear to be an achievable outcome within the near future.

**Section 5 – Other matters** – Participation in the ERCF Substitution Type Review subgroup was restricted. Qualification against each proposed reason code should have been provided in the Draft Determination to allow industry to make an informed decision and deliver an efficient review.