FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant*: Origin*

Submission Date*: 24 June 2019*

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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	12.7 (b) and (c) Recommend that procedures (i.e. SLP) provide service level to accordingly update the inventory within 5 business days
12.4	Removal of 'First Tier' references	Noted
	General comments	Please note, not all links work which reference related documents. E.g. In metrology Part A and B. Pages cannot be found.

Section	Description	Participant Comments

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)	Noted
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	In NER the term 'publish' refers to the distributor publishing information on their website. For non-contestable unmetered loads this is not warranted. Suggest rewording for 13.2.1 (b) and (c). Replace 'publish" with, "provide to the relevant registered participant"

Section	Description	Participant Comments
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	Noted
11.2.1	Removal of 'Local Retailer (LR)' references	Noted
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	Noted
11.4, 12.3	Provisions for 'bulk supply'	Noted
12.4	Provisions for UFE (unaccounted for energy)	Noted

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	Noted

4.3	NMI data details record (200) Field: RegisterID	Update the Definition to make the Register ID mandatory for all metered sites. All meter types should be treated the same, apart from Type 7. Interval Meter register identifier. Defined the same as the RegisterID field in the CATS_Register_Identifier table. The value should match the value in MSATS. e.g. "1", "2", "E1", "B1". Origin recommends Rewording to: The RegisterID is: Mandatory for type 1-3, 4, 4A and type 5 metering data when the sender of the MDFF file is the Current MDP. Not required for types 7 or when sending metering data to another MDP (e.g. Meter Churn data).
	NMI data details record (200) Field: Meter SerialSerialNumber	Currently, there are Meter Providers who have AEMO exemptions from the meter serial in the MDFF not requiring to meet the meter serial in MSATS. As part of the change to 5MS, Origin request that by 1/7/2021, these exemptions should be end dated and no longer applicable. MSATS should accordingly be updated with the correct serial number. Furthermore, Removal "Historical Data" from exiting wording. Historical request for meter data returns the current meter serial number as installed today and not the meter serial number at the time the meter data relates to.

		Current wording:
		Not required for type 7 metering installations, logical meters, Historical Data, or where multiple meters are summated to form a single RegisterID.
		New wording:
		Not required for type 7 metering installations, logical meters or where multiple meters are summated to form a single RegisterID.

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	Noted
3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	Noted
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	Noted

3.2.15, 3.2.16	Provisions for 'bulk supply'	Noted
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)	Noted
3.2.16,	Removal of 'Local Retailer (LR)' references	Noted
6.3, 6.4	Removal of aseXML csv payload tag reference	Noted
9.5	Removal of MDM RM14 MDP Data Version Comparison report	Noted
9.6	Removal of MDM RM15 Multiple Versions report	Noted
9.9	Removal of MDM RM18 Electricity Interval Data report	Noted
Appendix A	Provisions for FTP and API delivery method	Noted

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)	Noted
1.3	Inclusion of additional 'Related Documents'	Noted
3.6	Changes to table content	Noted
3.7, 3.8, 3.9, 3.12, 4.4.1	Removal of sections, including references to netting and aggregating to 30-minute	Noted
3.8, 5.1	Changes to MDMF content	Noted
3.11	Inclusion of file size references	Noted
4	Inclusion of Meter data messaging exchange content	Noted
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	Noted

7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
Quick Reference Guide, 3.4, 3.7, 3.7.2, 4.2	Removal of Change Reason Code 1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003, 4053, 5053, 5090, 5091, 6400, 6401	Noted
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)	Noted
2.9, 3.2, 4.11.2	Removal of 'First Tier' and 'Second Tier' references	Noted

| 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 | Origin asks: where the LNSP does not populate the LR in Create NMI Change Request, what will be the outcome when we receive CATS Notifications, Standing Data Responses, C4 and C1 Standing Data from MSATS in such a scenarios on a newly created NMI post 5 minute/GS go live.

Can we as the FRMP expect an LR role to be always provided in the standing data (possibly defaulted by MSATS when it is not populated by the LNSP) on all existing and new (post 5mins/GS) NMI's as is currently the case OR do we need to make changes to our systems and processes to cater for this LR data being provided optionally as per the LNSP obligations |
|---|---|---|
| 3.7.1, 3.7.2 | Changes in table references | Noted |
| 4.9 | Addition to and modification of NMI Classification Codes | Noted |
| 4.12 | Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code | Noted |
| 4.11.2, 4.17 | Provisions for UFE (unaccounted for energy) | Noted |
| Various | Updated table and section references throughout the document | Noted |
| General | AEMO validation | As was highlighted in the MFG it would be prudent for AEMO to ensure Non-Contestable Unmetered loads when loaded into MSATS cannot be transferred to another retailer. |

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	Noted
9.7, 10.7, 11.7, 12.7, 13.7, 14.7, 15.7, 18.7, 20.7, 21.9, 22.7, 23, 25.8, 26.7, 27.1, 28.1, 28.5	Provisions for embedded network local retailers (ENLR)	Noted
5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7	Removal of Local Retailer (LR) references	Noted
Various	Updated table and section references throughout the document	

Origin	General	Understanding of the ownership and complexity to install new cross boundary meters to allow for Global Settlement, and possible implications if erroneous data is uploaded into MSATS.

9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	Noted
2.2	Provisions for embedded network local retailers (ENLR)	Noted
2.4, 7	Provisions for non-contestable unmetered loads	Noted
7, 9.3	Removal of net data and net datastream references	7- still has reference to Net data
3, 7.2	Provisions for 'bulk supply'	Noted
7, 9.3	Removal of meter data to AEMO requirements	Noted

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	Noted
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)	Noted
6.1, 12	Removal of Second Tier references	Noted
Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	Noted

11.   Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	Noted

2.4.1	Inclusion of 5 February 2022 reference	Noted
3.7.1	References to MDM format and MDMT transaction groups	It is noted that AEMO require MDPs to ensure standing data contained within the 200 record of the MDFF is accurate to enable alignment and validation against MSATS. Origin recommend this is stipulated in service level procedures under 3.7.1 General.
3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	Noted
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	Noted
3.12.4	Changes to metering data quantity and quality requirements	The proposed arrangement for Data quantity and quality SLA provide a greater confidence level on data quality used for settlement. Origin recommend that for RRMD Final data, this should be 99.5% A or F quality. Victorian Government targets for AMI meters is 99.9% Actual data at 10 days. Origin believes 99% for final Q or F is achievable and will provide more confidence in Settlement Final calculation. Revision 1 proposed target is recommended to be 99.9% A or F quality; this is to cater for the outlier of sites that are being investigated prior to final substitutions being delivered. 100% A or F for Revision 2 is supported.

		In reference to the AEMO notes following the MFG; A & F are not the same quality. F substituted reads do not carry the same level of accuracy as an actual. Origin therefore recommends that for greater accuracy in settlement, additional targets are applied against actual data delivered. Actual Data Quality targets for RRIMs: Preliminary 98%, Final 99%, Rev1 99.5% and Rev2 99.9%
3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	Noted
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	Noted

12.   Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		Noted

13.   Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	Noted
2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage Requirements	
2.6.2	Inclusion of bulk supply and/or cross boundary references	
5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	

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?	

Heading	Participant Comments
• Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new procedural requirements?	
• 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?	
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	Origin notes the abbreviated time provided for feedback for this first consultation round. Given this, Origin would note the following high-level concepts with regard to un-metered non-contestable loads:- Prior to upload of assets into MSATS, a full, comprehensive audit be performed, subject to SLP by the responsive entity, to ensure data published is correct that pertains to devices connected and associated load values. Another SLP obligation for regular audits to be performed by the Network MDPs to ensure that data maintained in MSATS is accurate. Failure to do so leads to poor customer experience;

Heading	Participant Comments
Type 7 unmetered loads and why? o Should non-contestable unmetered loads which do not have photoelectric (PE) cells be treated differently to those that do? If yes, how should these loads be treated?	disputes during Network Settlements; billing errors and ongoing rebilling as a result of amended Inventory reports. A further SLP obligation on the LNSP/MDP is to communicate to the FRMP when work is undertaken at an UMS site; often this is bypassed the FRMP and may only be identified at the time a reconciliation is undertaken by FRMP. The approach to calculation of UMS profiles should have a 'National' approach, rather than a jurisdictional approach. In reviewing the types of UMS that Origin is responsible for, separating certain unmetered devices into profile types may be appropriate and addition of 'On/Off' data makes this more reliable. Makes sense for some metered devices due to load size and when load is used to have a flat profile assigned Origin strongly recommended that a working group is established by AEMO and development of NCONUML guidelines and AEMO published profiles. This will provide guidelines on processes for Networks and Retailers and clarity for managing the customer. The concept of 'Agreed load' by FRMP, LNSP/MDP, and Customer may be problematic, not least as FRMP may not be aware of any deltas in UMS type or count until reconciliation is undertaken.
• What should be considered in creating and assigning non-contestable unmetered NMIs in MSATS e.g. introducing a new Metering	

Heading	Participant Comments
Installation Type Code (NCONUML) and why?	
• What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why?	
Service Levels for Meter Data Provider Services	
• Will AEMO's proposed arrangements likely result in more accurate market settlements and why?	Refer to comments in 3.12.4 to ensure targets for actual data provided to market for Settlement calculation and not meeting target by just substituting S with F data.
• What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements?	In light of global distribution Loss Factor calculations methodology as the market get better visibility of energy consumption with smart meter consumption.
Exemption Procedure: Metering Provider Data Storage Requirements	
• Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process	

Heading	Participant Comments
for applying for a data storage exemption and why?	