

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: EnergyAustralia

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'Five-Minute Settlement Metering Procedure Changes – Package 2' Draft Procedures.

Please note, the change marked versions of the Draft Procedures highlights the changes required between the first stage Initial Draft Procedures and the second stage Draft Procedures.

The changes being proposed seek to enable 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
3.1	Requirements under National Measurement Act and Use of Standards	
3.4	“x” values – Calculation and Use	
12.3, 12.7	Provisions for non-contestable unmetered loads	It is not clear what the justification is for moving from physical inventory to calculation methodology/Agreed Load as the source of truth if a discrepancy exists.

Section	Description	Participant Comments
		<p>Given that NCONUML are likely to be less predictable load (as compared to Type 7), some form of periodic review of calculation methodology would be desirable. If the Agreed Load and calculation methodology becomes the “source of truth”, this might reduce an incentive to review and keep the calculation methodology updated as needed.</p> <p>This also creates an inconsistency with Type 7 metering (clause 12.7(b)), which is similar in nature to predictable NCONUML load, where the “source of truth” is the physical inventory. We note comments in the draft determination (4.1.2, Unpredictable Loads) that DNSPs may not have up to date inventories or an accurate agreed load or reliable load profile for NCONUML. This might result in exacerbation of inaccurate inventory.</p> <p>Our suggestion is that DNSPs should have a reasonable level of assurance or knowledge of its NCONUML inventory and undertake periodic reconciliation activities to ensure the physical inventory and calculation methodology/Agreed Load are aligned, keeping in mind the cost benefits associated with these activities. This should align with existing activities that DNSPs already undertake to ensure accuracy of the physical inventory count. These obligations already exist within Metrology Procedure B (clause 13).</p> <p>Suggested change:</p> <p>Revert 12.7(c) to:</p> <p>(c) Where there is a discrepancy between the Inventory Table held in the metering data services database for a non-contestable unmetered load and the</p>

Section	Description	Participant Comments
		calculation methodology and Agreed Load, the calculation methodology and Agreed Load Physical Inventory is to be taken as prima facie evidence of the actual number of Unmetered Devices.

3. Metrology Procedure: Part B

Section	Description	Participant Comments
12.3	Profile Area five-minute load profile calculation	Noted
12.4	Applying the five-minute profile to 15-minute and 30-minute metering data for a Profile Area	Noted
13	Non-contestable unmetered loads	Suggested changes: 1) Amend: 13.1.2 (b) MCs must ensure that a list the inventory table of non-contestable unmetered loads is maintained and kept up to date.

Section	Description	Participant Comments
		<p>Reasoning: Consistency with Metrology Procedure A.</p> <p>2) Add:</p> <p><i>(d)(vi) Customer and site details at a sufficient level of detail for the MC to locate the load/device</i></p> <p>Reasoning: Customer or site details would assist the MC to ensure the physical inventory is kept up to date. This could be provided at a geographical location level or, if suitable, at postcode level (as determined by the MC) as long as it is sufficiently meaningful for the MC to locate the load/device.</p> <p>3) Clarification requested:</p> <p>We would appreciate clarification on whether AEMO will require any obligations on legacy unmetered loads.</p>
Various	Inclusion of the word “affected”	

4. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
3.2.15, 3.2.17	Unaccounted for energy (UFE)	
5.2	MDP Obligations	
6	LOAD DATA – INTERVAL NMI DATASTREAM	
9.11- 9.14	MDM RM Reports	

5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.3	Local Network Service Provider	Noted
Various	Reference to NMI Procedures Appendix E	
4.4	Use of LR/ENLR within this Procedure	Noted
4.10	NMI Classification Codes	Clarifications sought: Will LARGE and SMALL classifications be applied to the NCONUML classification?

		<p><u>NREG:</u></p> <p>We understand this is only intended to apply to generators above >5MW. Can AEMO please confirm and provide specific examples of scenarios where NREG would apply?</p> <p>Also refer to comments on Appendix E in the NMI Allocation Procedure.</p>
4.12.2	Datastream Status Codes	Minor comment – typo in “ <i>DataStreamm</i> ”
4.13.1	Consequences of Allocating Certain Metering Installation Codes	
5	MSATS REPORTS	
Various	References to LR and ENLR	Noted
11, 13, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 30, 31, 32, 39, 40	Inclusion of NCONUML	Noted
Various	Updated table references	

6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
1.4	WIGS Codes and Rules for a Change Request	
Various	Inclusion of "NREG" NMI Classification Code	
Various	Inclusion of "BULK" NMI Classification Code	
Various	Inclusion of "XBOUNDRY" NMI Classification Code	
Various	Inclusion of "DWHOLSAL" NMI Classification Code	
Various	Provisions for embedded network local retailers (ENLR)	
Various	Removal of Local Retailer (LR) references	

7. National Metering Identifier

Section	Description	Participant Comments
VRH	Effective date updated to 1 July 2021	

Appendix E	Inclusion of appendix to better communicate NMI Classification and Role requirements	Clarification requested for: in what scenarios would the retailer be FRMP for NREG?
2.4	Allocation of NMIs for non-contestable unmetered loads	We support the changes made.
6	Changes to DATASTREAM SUFFIX	
A.19, A.20	Non Contestable Unmetered Load – One NMI With Multiple Devices	<p>A.19 Minor – typo in Multiple</p> <p>For clarity – suggest the diagram is set up as such: within distribution network LNSP1’s area where FRMP1 is the LR, end users (customers) are allocated to aNMI each. Suggest: NMI 55556666601 = END USER 1</p> <ul style="list-style-type: none"> - FRMP1 - LNSP1 - TNI1 - DLF123 <p>NMI 5...2 = END USER 2</p> <ul style="list-style-type: none"> - FRMP1 - LNSP1 - TNI1

		<p>- DLF123</p> <p>NMI 5...3 = END USER 3</p> <p>... and so on.</p>
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8. NEM RoLR Processes – Part A

Section	Description	Participant Comments
Various	Removal of first and/or second tier references	
Various	Provisions for ENLR	
Appendix 1	Average Daily Loads (ADL) in the ROLR_013 report	<p>In our submission on the consultation paper we raised concerns that ADL was insufficient for a ROLR to take on the market risk of a large customer as it was insufficient for accurately profiling and pricing a customer, and requested that historical load be provided for a 12 month period as this would help the ROLR mitigate risk.</p> <p>We would like to reiterate these concerns. ROLR events are likely to occur during periods of market volatility, and insufficient information to contract a (large) customer promptly, while putting them on the spot price, will expose a ROLR and potentially the market to risk. For a large customer making an offer promptly is necessary, and not having sufficient</p>

		<p>information to do so may put the ROLR at risk.</p> <p>It's unclear what the privacy or consent concern is as the customer's ADL would be provided anyway. If this is a concern perhaps other descriptive statistics that could help the ROLR in this situation could be provided, e.g. peak load/max demand in the past year in addition to ADL, and total energy consumption in the past year.</p>
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9. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
2.4	Specific obligations for MDP - Category D	
3.7	Metering Data Processing Requirements	<p><i>(f) ensure standing data contained in the 200 record of the Meter Data File Format (MDFF) file is accurate. Note: Where the MSATS Datastream table reflects a Net Level Data Stream Suffix, the standing data provided in the 200 line of an MTRD MDFF NEM12 200 line will be used by AEMO to identify the individual Register Level DataStream Suffix(s) that constitute the 'Net'.</i></p> <p>Clarification requested for:</p> <ul style="list-style-type: none"> - who has responsibility for updating the the standing data? - What does Accurate refer to, does this mean aligned with whatever is in MSATS?
3.10.2	Non-contestable Unmetered Load Calculation Methodologies and Agreed	

	Loads	
3.12.4	Delivery of Settlements Ready Data	We support the changes made.
3.12.5	Method of Delivery of Data	
5	METER CHURN DATA MANAGEMENT	

10. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
1.1	Purpose and scope	
1.2	Definitions and interpretation	
2	APPLICATION PROCESS	

11. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
2.7.7	Exemptions	
5	GLOSSARY	