

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services

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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 Metering ICF Package Changes consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.1.(l)	New section added to clarify the communication of the identification of incorrect NMI	<p>AusNet Services supports the intent of this new clause to encourage participants to cooperate with each other to correct CATS standing data. However, participants already have obligations to send the correct CATS standing data to the market in the form of CATS transactions. Where a registered participant confirms the CATS standing data for a record is incorrect and the registered participant can correct it by sending CATS transaction notifications without asking all impacted registered participants to investigate. We suggest obligations to send inefficient notifications to registered participants be removed while retaining the intent of the clause by making the following alteration.</p> <p>(l) When a Participant becomes aware that CATS Standing Data related to a NMI is incorrect, and that Participant must promptly notify notifies other impacted Participants. When notified Participants must cooperate with each other to facilitate the correction of the CATS</p>

Section	Description	Participant Comments
		Standing Data.
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	AusNet Services considers the current timeframes of 5 business days do not impact on market settlements and reconciliations, and the change to 2 business days is inconsistent with existing B2B Procedure allow up to 5 days to complete a Service Order. The processing of the B2B Procedure Service Order subsequently triggers the update to CATS Standing Data. We consider this change has not been financially justified by AEMO or Participants.
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	AusNet Services considers the current timeframes of 5 business days do not impact on market settlements and reconciliations, and the change to 2 business days is inconsistent with existing B2B Procedure allow up to 5 days to complete a Service Order. The processing of the B2B Procedure Service Order subsequently triggers the update to CATS Standing Data. We consider this change has not been financially justified by AEMO or Participants.
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	AusNet Services considers the current timeframes of 5 business days do not impact on market settlements and reconciliations, and the change to 2 business days is inconsistent with existing B2B Procedure allow up to 5 days to complete a Service Order. The processing of the B2B Procedure Service Order subsequently triggers the update to CATS Standing Data. We consider this change has not been financially justified by AEMO or Participants.
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	

Section	Description	Participant Comments
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	<p>AusNet Services currently updates remote de-energisations on the same day not the day after the connection point is de-energisations. Making the change will be costly. The change has not been financially justified by AEMO or by participants, nor is it necessary. One day, when MSATS becomes a near real-time system remote de-energisations will have to be updated on the same day and not the day after the de-energisations.</p> <p>However, if AEMO and other participants consider this change is justified or necessary then we request its implementation is not mandatory until July 2021 to reduce system implementation costs. This could be done, by adding the following words at the end of the clause:</p> <p>(a) Where an MPB is to update an Interval Meter Register Status Code to 'D' (De-energised) for a connection point that is remotely de-energised, the Proposed Change Date must be the day after the connection point is de-energised. This obligation only becomes mandatory by 1 July 2021.</p>
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re-energisations	<p>AusNet Services currently updates remote re-energisations on the same day not the day after the connection point is re-energisations. Making the change will be costly. The change has not been financially justified by AEMO or by participants, nor is it necessary. One day, when MSATS becomes a near real-time system remote re-energisations will have to be updated on the same day and not the day after the re-energisations.</p> <p>However, if AEMO and other participants consider this change is justified or necessary then we request its implementation is not mandatory until July 2021</p>

Section	Description	Participant Comments
		<p>to reduce system implementation costs. This could be done, by adding the following words at the end of the clause:</p> <p>(b) Where an MPB is to update an Interval Meter Register Status Code for Interval Meter to 'A' (Active) for a connection point that is remotely re-energised, the Proposed Change Date must be the day the connection point is re-energised. This obligation only becomes mandatory by 1 July 2021.</p>
4.18	<p>Updated to clarify the LNSP's obligations in relation to creating Embedded Network Codes and ENM's obligations in relation to application of the Embedded Network Code and data provided to AEIMO upon appointment.</p>	<p>We support the proposed change to clarify the LNSP's obligations in relation to creating Embedded Network Codes and ENM's obligations in relation to application of the Embedded Network Code.</p>

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	<p>Updated to align version numbering with MSATS: CATS procedures</p>	

4. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1.(a)	Update to remove the word 'relevant'	
3.1.(b)	Update to remove the word 'relevant'; add requirements of AS60044.3 or IEC61869.1 and IEC61869.2; and detail what each topic the part of the standard covers	Agree with the change to International Standards.
3.1.(c)	Update to remove the word 'relevant'; add requirements of IEC61869.1 and IEC61869.3; and detail what each topic the part of the standard covers	Agree with the change to International Standards.
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	Agree with the change to International Standards.
12.5.(a)	Removal of obsolete standard AS2490	Agree with the removal of obsolete standard AS2490.
12.5.(b)	New section added to detail Sample Test Plan settings	Not opposed to the proposed change.
12.5.(c)	New section added to specify when a test sample is deemed to have passes the verification test	Not opposed to the proposed change.

Section	Description	Participant Comments
12.5.(d)	New section added to specify when the steps to be followed after each round of verification	Not opposed to the proposed change.
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	Not opposed to the proposed change.

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	Not opposed to the proposed change.
5.3.9	Addition of substitution type 69: Linear Interpolation	Not opposed to the proposed change.

6. Service Level Procedure Meter Data Provider Services

Section	Description	Participant Comments
2.4.1.(ix)	New section added to define an obligation to activate datastreams when energy is recorded from a metering installation while the NMI status is not Active	AusNet Services considers the effect of this obligation and the changes to section 2.4 MSATS Procedures: CATS would be to create a two business day obligation to update the NMI status of energy is being recorded. We do not support the proposed changes that would have this effect because in order to reliably meet a two business day timeframe, the process of updating the NMI status would need to be automated. Automating NMI status updates would be costly.
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	See above comments
4.2.(g)	Amend outdated rule reference	
6.4.1.(c)	Amend outdated rule reference	
7.3.(b)	Amend outdated rule reference	

7. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2.(a)(iii)	Amend outdated rule reference	
5.2.(a)	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	

8. Service Level Procedure Embedded Network Manager

Section	Description	Participant Comments
2.1.2.(d)	New section added to define an obligation that the EN for which the ENM has been appointed has an exemption by the AER.	
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	

Section	Description	Participant Comments
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	

9. Exemption Procedure Meter Installation Malfunctions

Section	Description	Participant Comments
1.1.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
Appendix B	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	

10. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Are there better options to accommodate the change proposals, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?	
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	