

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Evoenergy

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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.(i)	Change in timeframe	<p>Accept most wording changes. Please provide context and purpose for the change to 10 business days.</p> <p>What is the benefit to participants or customers for this change? There is no mention of this in Issues paper.</p> <p>Please correct grammatical error in 2(i) (add 'is') ...for which it <i>is</i> responsible</p>
2.1.(l)	New section added to clarify the communication of the identification of incorrect NMI	Agree with proposed inclusion, requires clarification on timeframe denoted by 'promptly' and method of notification e.g.: via B2B.
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	Generally Agree.

Section	Description	Participant Comments
		<p>For simplicity, suggest changing statement to “An MDP must within two business days:” and remove timing from each dot point.</p> <p>As per additional comment at end of consultation document (p13), please include clarity on when the two business day count commences.</p>
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	Agree
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	<p>Agree</p> <p>Grammatical coorection – please add ‘the’</p> <p>“...the Proposed Change Date must be the day the connection...”</p>
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	Agree
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	Agree
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	<p>Agree</p> <p>Need to add a timeframe in the same way as has been added for MDP</p> <p>Suggested wording to get added to the heading</p> <p>An MPB must, within two business days:</p>

Section	Description	Participant Comments
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	<p>Agree</p> <p>Need to add a timeframe in the same way as has been added for MDP</p> <p>Suggested wording at heading as per above</p> <p>Should also consider adding timeframe to each heading of “A New MPB must” add “, within five business days:”</p> <p>2.5(j) – please have consistency of numerical representation, either ‘five’ or ‘5’. This is an issue throughout the document.</p>
4.9	4-5	Need to align the table as appears thresholds are not portrayed correctly.
4.13	Table 4-13	<p>ER – We should reference here that this is really a Substituted read, as the Old FRMP will need to provide an invoice to the customer. The New FRMP needs a starting billable read. An Estimated read for types 4A, 5 and 6 are Forward Estimates in accordance with metrology procedures, so no retailer invoices on receipt of this. Change wording in Description of code only and replace “Estimated” to “Substituted”.</p> <p>SP – The MDP or MPC (or LNSP) will not arrange for a special read until a B2B Service Order is received. This will indicate the type of special read to be undertaken, allowing appropriate charges to be applied..</p> <p>Suggest Reword Description of code to:</p>

Section	Description	Participant Comments
		<p>Used where the New FRMP requires an End User transfer date that does not align with the scheduled reading cycle, or where other Read Type Codes do not fall within the boundaries of the End User request. The New FRMP must set the Proposed Change Date to the scheduled date as per the appropriate B2B Service Order.</p> <p>Applies to type 4A, 5 and type 6 metering installations.</p> <p>Note: that if this wording is accepted, need to update HINTS AND TIPS - CATS & NMI DISCOVERY</p>
4.18	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 AEMO upon appointment.	<p>Agree</p> <p>Seeking clarification on how this will be monitored.</p>

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	Agree

4. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1.(a)	Update to remove the word 'relevant'	Agree
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
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
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	Agree
12.5.(a)	Removal of obsolete standard AS2490	Agree
12.5.(b)	New section added to detail Sample Test Plan settings	Agree
12.5.(c)	New section added to specify when a test sample is deemed to have passes the verification test	Agree
12.5.(d)	New section added to specify when the steps to be followed after each round of verification	Agree

Section	Description	Participant Comments
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	Agree

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	Agree
5.3.9	Addition of substitution type 69: Linear Interpolation	Agree

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	Agree Please consider the inclusion of a specified timeframe for action e.g.: two business days.
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	Agree Please consider the inclusion of a specified timeframe for action e.g.: two business days.
4.2.(g)	Amend outdated rule reference	Agree
6.4.1.(c)	Amend outdated rule reference	Agree
7.3.(b)	Amend outdated rule reference	Agree

7. Service Level Procedure Meter Provider Services

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

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.	Agree
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	Agree
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	Agree, but suggest wording to avoid confusion when trying to read this, that start of point (a) should read:

Section	Description	Participant Comments
		“provide to AEMO the DLF value for the site-specific DLF Code, as calculated...”
4.3.3.(a)	Updated to clarify ENM’s obligations with respect to Network Tariff Codes.	Agree

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.	Agree
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Agree
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Agree
Appendix B	Updated to incorporate additional clause reference for timeframes for metering	Agree

Section	Description	Participant Comments
	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?	Stated above in consultation response
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Versioning with the 5MS & GS changes coming, ensuring that when these are approved, they are working/revising latest changes, especially since this consultation changed the table numbers in the CATS procedures, but the consulted 5MS & GS was based on old table references.
CATS Procedure	Throughout the document additional clarity on when timeframe counts commence is required. For example, MDP two business days. Please define when the count commences.
CATS Procedure	The document references 'connection points' and 'meter register status code'. Where there are multiple meters at a connection point, and there is a mismatch in individual meter meter register

Heading	Participant Comments
	codes (e.g.: date, status), which takes precedent? The connection point or the meter register status code?