

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Vector Advanced Meter 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 ‘Five-Minute Settlement Metering Procedure Changes – Package 1’ consultation.

The changes being proposed are as a result of the Australian Energy Market Commission making a final rule to align operational dispatch and financial settlement at five minutes, starting 1 July 2021.

The Rule change requires the collection, storage and delivery of revenue metering data based on five-minute intervals for use in energy settlement, network and retail billing.

2. Metrology Procedure: Part A

Section	Description	Participant Comments
3.2 (c)	<p><i>Use of Optical Ports and Pulse Outputs</i></p> <p>.....</p> <p>(C) A type 4A or 5 metering installation must have an optical port that meets the AS 1284.10.2 or AS 62056.21 or a computer serial port to facilitate downloading of 90 days of interval energy data for each meter associated with the metering installation in 35 seconds or less.</p>	<p>This clause should be looked at. Under 5MS the volume of data downloaded via the optical port will increase by a factor of 6. Physical constraints (baud rate) of this interface limits the speed at which this data can be downloaded.</p> <p>Vector recommends that this performance requirement is removed for type 4A metering as commercial incentives will drive an appropriate performance outcome.</p>

Section	Description	Participant Comments
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter.	Agree.
7	Removal of South Australia requirement (2) Removal of Tasmania requirement (2)	Agree.
12.2 (f)	Change to clause reference	Agree.
12.8.2 (b)	Change in section reference	Agree.

3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to page references	Agree.
11.2.1	Update to section reference to Metrology Procedure: Part A	Agree.
11.2.2	Update to section reference to Metrology	Agree.

Section	Description	Participant Comments
	Procedure: Part A	
11.2.3	Update to section reference to Metrology Procedure: Part A	Agree.
11.3.1	Update to section reference to Metrology Procedure: Part A 'Half hourly' reference updated to 'Interval'	Agree.
11.3.2	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Agree.
11.4	Update to section reference to Metrology Procedure: Part A 'Half hourly' reference in formulas updated to 'TI' 'Half hourly' reference updated to 'Five minute' Updates made to formulas	Agree.
11.5	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Agree.

Section	Description	Participant Comments
11.6	Change end dates from '23:30' to '23:55'	Agree.
12	New section added to detail the conversion of interval metering data, previous section 12, and following section numbering, have been changed due to this insertion	Agree.
13.1.4	Update to section references	Agree.
13.2.2	Update to section reference to Metrology Procedure: Part A	Agree.
13.2.4	Update to section references Update to formulas	Agree.
13.2.5	Update to formulas	Agree.
13.2.6	Update to section references Update to formulas	Agree.
13.3	Update to section references	Agree.
13.3.2	Update to section reference to Metrology Procedure: Part A	Agree.
13.4	Update to section reference	Agree.

Section	Description	Participant Comments
13.5.2	Update to section reference to Metrology Procedure: Part A	Agree.
13.5.4	Update to section reference Update to formulas	Agree.
13.5.5	Update to formulas	Agree.
14.1	Update to section reference	Agree.
14.3	Update to section reference	Agree.

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

Section	Description	Participant Comments
3.3.3	Included references to five-minute interval metering data	Agree.
4.3	NMI data details record (200) - Added '5' to the Interval Length field Definition	Agree.
Appendix H	Section added to include five-minute meter data file example	Agree.

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
4.4.4	Removal of NEM12 & NEM13 File Clarifications	Agree.
5	Addition of various glossary items, including those from the 'Meter Data Provision Procedure'	Agree.

6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	Agree.
1.2.1	Glossary removed and now included in the Retail Electricity Market Procedures – Glossary and Framework document	Agree.
1.2.2	Interpretation section removed from the document	Agree.

Section	Description	Participant Comments
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	

7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	No comment on this section as profiling will not impact Vector.
<ul style="list-style-type: none"> What is your view on the proposed profiling approach for 15 and 30-minute non-controlled load meter reads and why? 	
<ul style="list-style-type: none"> What is your view on the proposed profiling approach for 30-minute controlled load meter reads and why? 	
<ul style="list-style-type: none"> Are there better profiling options to accommodate 5MS, that better achieve the 	

Heading	Participant Comments
<p>required objectives? What are the pros and cons of these options? How would they be implemented?</p>	
<p>Meter Data Delivery to AEMO</p>	
<ul style="list-style-type: none"> What are your views on AEMO transitioning to MDFF and why? 	<p>This proposed change will transfer the ‘netting’ calculation currently performed by the MDP to AEMO. This requires changes to both the MDP systems and the AEMO systems, and potentially impacts the current requirements for populating CATS tables. Vector is unclear on why this change is required for 5MS and Global settlement projects and has yet to see a compelling argument for this. Current MDP’s already have systems and processes in place to support ‘Netting’ of meter data and providing this data to AEMO in the current MDN format. Moving from 30 min to 5 min is a relatively small change to these processes. Make the changes proposed to move functionality from the MDP to AEMO requires much larger changes to MDP systems as well as AEMO systems to achieve the same outcome. On the surface, this change appears to fail the cost/benefits test.</p> <p>From an MDP perspective just adopting the MDFF file format without the retiring the MDN process provides little benefit to the MDP. MDP system providers will charge for this change and MDP will still have two distinct processes for data delivery – one to AEMO and a separate one to other participants. If the MDN process was decommissioned and Industry relied on the b2b process as the only method of distributing Meter Data therefore reducing the number of processes to maintain a stronger business case for adopting the MDFF may exist.</p>
<ul style="list-style-type: none"> What are your views on AEMO supporting the reception of register level 	<p>This requires changes at for both the MDP and AEMO and potentially impacts the current requirements for populating CATS tables. Vector is unclear on why this change is required for</p>

Heading	Participant Comments
<p>meter data and why?</p>	<p>SMS and Global settlement projects.</p> <p>Vector has concerns on the impact to the existing market processes and the requirements on populating the CNDS table. Currently this table is loaded with the 'N' Suffix identifier for interval metering. Should new procedures require register level standing data to be populated into CNDS participants processes and systems will require significant change. This will also introduce issues related to standing data synchronisation as meters transition from the MDN to the MDFF. Vector acknowledge that AEMO are working on a solution to this issue but we are currently unclear on the impact of any alternative proposal. Any change away from the current process requires careful assessment to understand the impact on participants.</p>
<ul style="list-style-type: none"> What are your views on MDPs sending the same files to both market participants and AEMO, energy and non-energy, and why? 	<p>MDP's don't send the same files to all participants, they send meters data to participants including AEMO in separate physical files, up to the file size limit (1 MB). Each file generated will be tailored for the participants market role E.g. FRMP's will get files containing meter data from NMI's that they are the current retailer for. The LR will receive meter data from NMI's from the Network area that the LR is responsible for. Each DB will receive meter data for NMI's that are within their network. AEMO will receive all meter data. It is a misunderstanding that the same file can be sent to all participants. Moving from MDN to MDFF for data delivered to AEMO is not a huge benefit. The only real saving is the netting process currently performed by the MDP is no longer required.</p> <p>Where AEMO refers to 'non-energy' we assume you are referring to the Q and K streams which provide 'reactive energy' measurements. Vector is neutral about whether AEMO should receive this. If AEMO is referring to something other than reactive energy then Vector would need to understand what is being proposed before we could comment.</p>
<ul style="list-style-type: none"> What are the main challenges in adopting these 	<p>Vector is primarily concerned with the proposal that AEMO use the MDFF file format to receive</p>

Heading	Participant Comments
proposed changes? How should these challenges be addressed?	register level data and the associated impacts on NMI standing data in CATS tables. Depending on the outcome this has a potential to make the transition from 30 to 5 minute data complex, error prone, costly and should things go wrong impact on market settlements. Vector recommends that a pragmatic, low risk approach that recognises these issues and risks and avoids unnecessary change. Vector believes that CATS contains enough standing data today for AEMO to perform settlements calculations - retailers have been successfully reconciling the AEMO invoice using available data since market start. Should AEMO identify standing data quality issues that impact its ability to use the current data set then the industry has the time to address these between now and the start of 5MS in 2021.