FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Evoenergy

Submission Date: 19 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
3.4 (d)	Table	This table is set-up differently to 3.4 (b) & 3.5 (b). Should standardise this table to: <table><tr><td>Jurisdiction</td><td>Variation in accordance with Jurisdictional policy</td></tr><tr><td>New South Wales Australian Capital Territory Queensland</td><td>Value of "x" is 100 MWh per annum</td></tr><tr><td>South Australia</td><td>Value of "x" is 160 MWh per annum</td></tr></table>

Section	Description	Participant Comments	
		Tasmania	Value of "x" is 150 MWh per annum
		Victoria	Value of "x" is zero (0) MWh per annum
12.3, 12.4, 12.7	Provisions for non-contestable unmetered loads	Agree with changed wording except 12.4 (see notes below)	
12.4	Removal of 'First Tier' references	In dot point 12.4 (b) now does not need to have the 3rd dot point as all loads must be transferred. Reword to: (b) The MC must ensure that metering data from the following is transferred to AEMO: (i) interval metering data for all loads, and (ii) accumulated metering data for all loads.	

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)	Replacing LR with ENLR does not address the change in (LR) role obligations. Where previously all NMIs would have an LR assigned, post 5MS, not all NMIs will have an ENLR role assigned. Wording as is indicates MDPs must still consult or notify in all instances, however will no longer be applicable in all cases. Suggest include "…ENLR (where applicable)…"
3.3.12	**NEW** Type 22 – Five minute conversion historical data and churn	Suggest a new type to provide new flag to identify where interval data split from 15 or 30 minute down to this finer granularity, and is really no longer actual data. Intent is for churn, participants can identify where actual data has been manipulated. Suggest wording with this is: Where a 15 or 30 minute actual interval is replaced with a five minute interval based on calculation applied to actual historical 15 or 30 minute interval.
6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4,	Provisions for non-contestable unmetered loads	In 13.1.2(a) (p39 of marked document) Rules clause reference is incorrect and should be 7.16.3(c)(6A) What is the reasons behind publishing a Load Table and Inventory table for non-contestable loads (largely insignificant loads)? This is not required

Section	Description	Participant Comments
13.2.1, 13.3.1		currently unless they are "market loads" (therefore contestable). The proposed change will not be cost effective and does not appear to benefit customers or the market. Seeking to understand rationale behind proposal. NER only refers to the metrology procedure to include arrangements for the "market loads". Suggest removal of dot points (b) and (c) only.
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	Agree
11.2.1	Removal of 'Local Retailer (LR)' references	Ok
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	Ok
11.4, 12.3	Provisions for 'bulk supply'	Agree

Section	Description	Participant Comments
		Suggest the definition of bulk supply point is included in glossary, or the National Metering Identifier procedure that provides the definition is referenced
12.4	Provisions for UFE (unaccounted for energy)	Agree

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

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

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	Agree
3.2.11, 3.2.14,	Removal of 'First Tier' and 'Second Tier' references	Agree

3.2.15, 3.2.16, 9.3		
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	Agree
3.2.15, 3.2.16	Provisions for 'bulk supply'	Agree Suggest the definition of bulk supply point is included in glossary, or the National Metering Identifier procedure that provides the definition is referenced
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)	Replacing LR with ENLR does not address the change in (LR) role obligations. Where previously all NMIs would have an LR assigned, post 5MS, not all NMIs will have an ENLR role assigned. Wording as is indicates MDPs must still consult or notify in all instances, however will no longer be applicable in all cases. Suggest change to "…LR or ENLR (where applicable)…"
3.2.16,	Removal of 'Local Retailer (LR)' references	See above
6.3, 6.4	Removal of aseXML csv payload tag reference	Agree
9.5	Removal of MDM RM14 MDP Data Version Comparison report	Agree

9.6	Removal of MDM RM15 Multiple Versions report	Agree
9.9	Removal of MDM RM18 Electricity Interval Data report	Agree
Appendix A	Provisions for FTP and API delivery method	Agree

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)	The Figure and Table number references starting from section 4 appear to be out of alignment e.g. 4.1 MDMT Messaging Exchange Figure 7 and Table 8 provide… But directly underneath that reference is Figure 6 and Table 7
1.3	Inclusion of additional 'Related Documents'	Agree
3.6	Changes to table content	Approved
3.7, 3.8, 3.9, 3.12, 4.4.1	Removal of sections, including references to netting and aggregating to 30-minute	Agree
3.8, 5.1	Changes to MDMF content	Accepted

3.11	Inclusion of file size references	Agree
4	Inclusion of Meter data messaging exchange content	Agree
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	Agree

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	Agree with changes except 6400 & 6401. LR is still part of the registered participant roles, and therefore can still be nominated. You have removed any method of changing the LR if nominated incorrectly, past or future.
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,	Provisions for embedded network local retailers (ENLR)	Why is 25.5 not included as part of this change? Agree, except for the following clauses where wording should be updated to reflect "…ENLR (where applicable…)" as per previous comments re: ENLR role. 2.6, 9.5, 15.7, 16.7, 17.7, 18.8, 19.8, 20.7, 21.7, 22.7, 23.7, 25.10, 27.7, 30.7, 31.8, 32.7, Old 33, Old 35.7, Old 36.8, Old 37.9, Old 40.7

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		
2.9, 3.2, 4.11.2	Removal of 'First Tier' and 'Second Tier' references	Agree
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	Drop the LR role completely, so it is not mandatory or optional in any change request, only mandatory for Embedded Networks. Not approved, see notes above
3.7.1, 3.7.2	Changes in table references	Agree
4.9	Addition to and modification of NMI Classification Codes	Table 4-E does not appear to align correctly for Large and Small annual loads. For the new Codes "DHYBRID" and "THYBRID", please define what 'significant' means here? Is there an X value like Large in MW? Disagree with NCONUML, already flagged in 4.12 at the Meter Installation level; it is still a Large or Small. Remove from 4.9 and include at 4.12.

4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	Agree, but already flagged in 4.9 at the NMI level, it is still Large or Small. Remove from 4.9 and have here.
4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	Agree
4.13	Table 4-M Read Type Code "SP" and "ER"	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". 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.. Reword Description of code to: 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. Applies to type 4A, 5 and type 6 metering installations. *Note*: If this wording is accepted, HINTS AND TIPS - CATS & NMI DISCOVERY will need to be updated

Various	Updated table and section references throughout the document	Agree

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 Change Reason Code 1050, 1051, 6400 and 6401	Agree with changes except 6400 & 6401. LR is still part of the registered participant roles, and therefore can still be nominated. You have removed any method of changing the LR if nominated incorrectly, past or future.
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)	Why not 2.8 & 2.9, 5.4, 5.7, 5.8, 6.4, 6.7, 7.4, 7.6, 7.7, 8.4, 8.7, 16.4, 16.5, 16.9, 17.7, 19.7, 21.8, 22.6, 24.7, 26.4, 27.1, 27.3?

Agree, except for 3.8, 6.8, 9.7, 10.7, 11.7, 12.7, 13.7, 14.7, 15.7, 16.7, 18.7, 20.7, 21.9, 22.7, Old 23, 25.8, 26.7, 28.5, 29.5

Need to add wording after ENLR

ENLR (where applicable)…" |
| 5.7, 5.8, 7.6, 7.7, 16.9, 16.10, | Removal of Local Retailer (LR) references | Drop the LR role completely, so it is not mandatory or optional in any change request, only mandatory for Embedded Networks. |

17.7, 19.7, 24.7		Not approved, see notes above
Various	Updated table and section references throughout the document	Concur

9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	Should reword 2.2 from (d) to include all variations 2.2 (d) For Transmission connection points, the NSP must populate the LR field (*) with the appropriate jurisdictional participant ID e.g. POOLxxx. (e) For child connection points the ENM must populate the LR field (*) with the Parent FRMP Participant ID (this will be the ENLR). (f) For all other connection points, the LNSP must populate the LR field with GLOPOOL. *to be updated to ENLR dependent on previous comments*
2.2	Provisions for embedded network local retailers (ENLR)	Agree, see above
2.4, 7	Provisions for non-contestable unmetered loads	Disagree with creating a whole section that copies the previous section, where common requirements across all as these are still, relatively speaking, unmetered loads.

		Remove (h) and (I) from Common, and move them to new points 2.3.2 as (a) and (b) New header 2.3.2 Contestable unmetered loads Change 2.4 to be 2.3.3, and only list the differences, so remove all dot points except (f) Add words to 7 (a) *…type 1 to 5 or 7 (contestable and non-contestable) load*s.
7, 9.3	Removal of net data and net datastream references	Agree with change, but add to end of 6.2 (c) for clarity … Net = Export – Import (E-B).
3, 7.2	Provisions for 'bulk supply'	Seeking clarification on difference between a wholesale point and a bulk supply point. Are they both transmission connection points? If so, suggest using one term for both throughout all documents, and clearly specifying in Glossary the differences.
7, 9.3	Removal of meter data to AEMO requirements	Agree
Appendix A	A18	Remove references to a specific type 7, heading to read: *Type 7 contestable and non-contestable metering installation* Change words "lamp" to "device"

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	Will AEMO do a BCT and update the LR to "GLOPOOL" on a failure or before? Need to list what is going to happen with the LR role, as was not included or clear in the Issues Paper released with this consultation, nor in any of the changed procedures.
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)	Disagree but dependent on above actions. Note: LR role still exists in the NEM, so are you sure that a blanket replacement of LR to ENLR is correct 100%, even for BULK and WHOLSALE Would it be better to state "LR (or ENLR where applicable)" in most of these? Or maybe add under 1.2 "Any reference to LR in this document also refers to ENLR where applicable." Similar to how you refer to the ENM as the LNSP in child NMI's. Section 12 Agree with changes.
6.1, 12	Removal of Second Tier references	Agree Clarification sought on why references to First or Second Tier have been added in sections 11, 12, 13, 102.3, 103.2, 105.3, Appendix 1
Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	Agree

11. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	Agree
2.4.1	Inclusion of 5 February 2022 reference	Disagree (x) and (xi) reword to: "(x) deliver validated metering data, in accordance with the requirements of the relevant procedures, to: A. market participants with responsibilities for that NMI, and B. AEMO, when Data streams are active in MSATS." (xii) B. Why are you still referring to First Tier when it has been removed from every other document? Remove this dot point.
3.7.1	References to MDM format and MDMT transaction groups	Can refine this further, suggest reword to: (e) aggregate interval metering data for a connection point into a 30-minute interval net data stream prior to delivery to AEMO, as required by the MSATS, MDM and NMI Procedures, when interval metering data is delivered to AEMO in the MDMT Transaction Group;
3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	3.11 (a) end sentence with …and 7 contestable and non-contestable unmetered loads. *(consider if non-contestable unmetered loads be referred to as type 7a for clarity (as per 4 ad 4a))*

		3.11 (b)(ii) point C not required, suggest just reword B to: B. from the date of the last calculation to a period beyond the next scheduled calculation for type 7 contestable and non-contestable unmetered loads. 3.12.2 (f) suggest same as above rewording (f) For metering installation types 4A, 5, 6 and 7 (contestable and non-contestable unmetered) loads, …
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	Agree
3.12.4	Changes to metering data quantity and quality requirements	Whilst intent to drive more accurate market settlements is understood, it is impractical to set a 100% compliance target even at R2. Is AMEO able to provide insights into how current performance is expected to change to consistently achieve 100%? A small proportion of exceptions should be allowed for, for example a 99.9% target.
3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	For 3.12.5 (c) Phrasing is ambiguous. Please clarify; suggested wording below

		(d) The MDP may, deliver interval metering data to AEMO in MDFF format from a date agreed with AEMO, but must deliver interval metering data to AEMO in MDFF format from 1 July 2021. For 3.14.2 (c) why name only these procedures as they may change, what about the technical procedures, or new ones added, suggest reword to: (c) Each MDP must manage any batch file transfers to MSATS in accordance with the relevant procedures.
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	Agree

12.   Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure	2.1 (a)	What is the significance of 30 days? Rather than stating any period, reword end of dot point to the following to align to current requirements "…for a period less than NER clause 7.8.2(a)(9).
	2.1 (b)	Suggest change words to:

		(b) An exemption will not be granted by AEMO for a metering installation with less than an agreed storage level days of five-minute interval energy data for all configured Data streams.
	2.2 (b)	Remove end of sentence after NER clause 7.8.2(a)(9) as should align, or should only state it in 2.1
	2.6 (b)	Remove end of sentence capacity as should not state a limit, or should only state it in 2.1, suggest reword to: (b) The metering installation reconfiguration referred to in the application does not meet the requirement to have the minimum storage capacity.

13.   Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	Ok
2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage Requirements	In 2.7.7 Has too much information. Should only state what it is there for. Reword to: (b) Exemption Procedure – Metering Installation Data Storage Requirements. This Procedure sets out the process by which a Current MP may apply for an exemption from complying with the requirements of NER clause

		7.8.2(a)(9) for the storage of interval energy data for metering installations installed before 1 July 2021.
2.6.2	Inclusion of bulk supply and/or cross boundary references	Ok
5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	Please remove references to First and Second Tier loads and Sites Do we need to define what the LR really is now for Wholesale and Bulk and interconnector etc. sites?

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?	Yes
• Will the proposed transitional arrangements assist MDPs and other market participants	Yes, see note below

Heading	Participant Comments
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?	This approach has been taken in the past allowing participants to successfully transition to new arrangements in a staged manner. Any transitional arrangements included in a procedure should be clearly time bound allowing removal without consultation post end date.
Non-contestable Unmetered Loads	Evoenergy already publish contestable and non-contestable Type 7 NMI's to the market, i.e. treated the same, and send the calculated metering data to MSATS and market participants.
• 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 Type 7 unmetered loads and why?	• They are all unmetered connections to the network. • They are singularly very small loads, but when aggregated to customer/market NMI level can be large. • MSATS and Retailers require the aggregated NMI interval metering data. Each LNSP needs to manage individual connection points for outage management, notifications and customer reconciliation. • Devices and loads are agreed with the Network, either 24/7 flat loads, or on/off lighting. • Only require to maintain a national published table if contestable.

Heading	Participant Comments
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?	
• What should be considered in creating and assigning non-contestable unmetered NMIs in MSATS e.g. introducing a new Metering Installation Type Code (NCONUML) and why?	A new Metering installation type code is required, but not a new NMI classification code as these remain type 7
• What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why?	As stated above, they would be flat profile or same as streetlights
Service Levels for Meter Data Provider Services	

Heading	Participant Comments
• Will AEMO's proposed arrangements likely result in more accurate market settlements and why?	No. Will this not increase unnecessary costs on the MDP to meet targets that may not be achievable, especially for a decreasing volume of manually read meters? What is the intended benefit for customers balanced against imposed costs on MDP in achieving 100% quantity and quality especially for type 5 and 6 meters? How will technical complications with remote read meters be handled / allowed for. For example, comms failure resulting in no data being received? How will the need for type 4 subs be managed / monitored by AEMO? Agree with the table category breakdown. It is not reasonable nor cost effective to achieve 100% compliance particularly with manually read meter types.
• What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements?	No relevant comment
Exemption Procedure: Metering Provider Data Storage Requirements	
• Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process	The exemption process is required, however the limit should align to the NER to prevent additional costs being imposed on MPs where they fall below the Rule requirement but above

Heading	Participant Comments
for applying for a data storage exemption and why?	the lower limit proposed in the exemption procedure (e.g.: between 30 and 35 days of data storage). An end date or maximum time period is also required to prevent ongoing non-compliance with no incentive for the MP to comply with the rules.