FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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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
12.3, 12.4, 12.7	Provisions for non-contestable unmetered loads	
12.4	Removal of 'First Tier' references	

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)	
6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4, 13.2.1, 13.3.1	Provisions for non-contestable unmetered loads	
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	

Section	Description	Participant Comments
11.2.1	Removal of 'Local Retailer (LR)' references	
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	
11.4, 12.3	Provisions for 'bulk supply'	
12.4	Provisions for UFE (unaccounted for energy)	

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	

3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	
3.2.15, 3.2.16	Provisions for 'bulk supply'	
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)	
3.2.16,	Removal of 'Local Retailer (LR)' references	
6.3, 6.4	Removal of aseXML csv payload tag reference	
9.5	Removal of MDM RM14 MDP Data Version Comparison report	
9.6	Removal of MDM RM15 Multiple Versions report	

| 9.9 | Removal of MDM RM18 Electricity Interval Data report | |
| Appendix A | Provisions for FTP and API delivery method | |

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)	PLUS ES seeks clarification: With the Term MDFF added to Section 3.3. c) it appears that all Datastreams must be in the CNDS Table. This is not what AEMO have been conveying previously in their forums; the understanding was that only new metering was required in CNDS. PLUS ES suggests the following for Section 2.2 (Paragraph 3) which also supports MDP SLP section 3.12.4 PLUS ES believes the obligations on the MDP to deliver metering data to AEMO are ambiguous. Clause 3.12.4, requiring the MDP to deliver 'all Datastreams' to AEMO, does not support commitments made by AEMO to allow MDPs to 'transition' to the NEM12 format. Further, PLUS ES encourages AEMO to reconsider its position with regard to the delivery of metering data to MSATS. In short, the delivery of metering data in the MDM format should be validated against the NMI Datastream, and the delivery of metering data in the NEM12 format should be delivered against the NMI Suffix recorded against the meter register.

There are a number of reasons for this approach: -

1.   Clause 2 (c) of the MDFF specification requires an MDP to include 'all NMI suffixes associated with a NMI for any IntervalDate' in the same 100-900 block. Experience tells us this does not always happen. Without validating all suffixes/registers are included for the IntervalDate, AEMO risks incorrectly calculating settlement data.

2.   Current recipients of the NEM12 file format typically validate against the registers. It would be prudent for AEMO to exercise similar validation to ensure consistency across the market.

3.   How will AEMO deal with the removal of a contributing suffix from a Net calculation? Whilst this is a relatively rare occurrence, a suffix being made inactive does not require metering data to be re-sent for the remaining suffix, and even if it were, it would be rejected on account of a duplicate version date/time.

4.   There is no reason why an MDP should be required to replicate information recorded in the meter register, information that forms part of the structure and validation of the NEM12 file, in the datastream table.

5.   And, at some time in the future, the datastream table should become redundant.

If AEMO is to allow a transitional approach to the delivery of metering data, the obligations specified in MDL SLP clause 3.12.4 need to be modified such that they allow for, and articulate, the transitional arrangements.

	Removed/deleted Clause 1.3	Clause 1.3 This clause appears to be deleted but the DCTC Code is still present in the examples. PLUS ES suggests AEMO takes the least change approach. OK, if the DCTC are not being used but do not make amendments to the MDM form to reflect this change.
1.3	Inclusion of additional 'Related Documents'	
3.6	Changes to table content	
3.7, 3.8, 3.9, 3.12, 4.4.1	Removal of sections, including references to netting and aggregating to 30-minute	
3.8, 5.1	Changes to MDMF content	
3.11	Inclusion of file size references	
4	Inclusion of Meter data messaging exchange content	
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	

7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
General	LR vs ENLR	PLUS ES recommends that a consistent approach is used throughout the document when referencing LR & ENLR

If the intent is to maintain LR code but in actual fact it represents ENLR, similar with RP and MC, then the document should reflect LR not ENLR in some sections/Tables and in others LR.

A review should also ensure that Inclusion of LR will be optional moving forward i.e. mandatory for Embedded Networks |
| 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 | |
| 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, 21.7, 22.7, | Provisions for embedded network local retailers (ENLR) | |

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	
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	
3.3	Transaction Types (b)	Section 3.3(b): Reference of Section 0. Typo?
3.7.1, 3.7.2	Changes in table references	
4.9	Addition to and modification of NMI Classification Codes	PLUS ES has no issue with the additional NMI Classification codes themselves. Querying the overall value they would deliver vs the cost to update systems, including the billing component:

		• Impacting every Mkt Particpant – system validations, etc • Volume of NMIs compared to general population for these codes. PLUS ES suggests that these additional codes be included in a separate field: • this is the only location these codes are mentioned in the CATS document other than NCONUML • NMI Classification Code not an appropriate field.
4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	Table 4-L – Metering Installation Type Codes PLUS ES recommends for clarity that the Manually Read Flag for NCONUML code is populated at minimum with a N/a, rather than left blank.
		Section 4.12.1 - Consequences of Allocating Certain Metering Installation Codes PLUS ES would like to suggest: For the new Metering Installation Type Code of NCONUML, the DataStreamType should be allowed to be either I (Interval) or C (Consumption) - defined in both subsections (a) and (b) This would allow the MDP the flexibility to send the Non-Contestable unmetered data as either Interval data (where it exists) or Consumption data (where DAL agreement exists with the customer)

| 4.11.2, 4.17 | Provisions for UFE (unaccounted for energy) | |
| Various | Updated table and section references throughout the document | |

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

Section	Description	Participant Comments
General		PLUS ES notes that there is inconsistent references with respect to LR vs ENLR.
General		The additional NMI Classification Codes BULK, THYBRID, DHYBRID, NCONUML, XBOUNDRY have not been included in the WIGs. If they have not been included in any CATS procedures and not referenced in WIGS, PLUS ES questions the value of including them in the NMI Classification Code. One would expect them to play a role in the Market, either as exclusions to processes or used within processes.
Quick Reference Guide, 23	Removal of Chane Reason Code 1050, 1051, 6400 and 6401	
9.7, 10.7, 11.7, 12.7, 13.7, 14.7,	Provisions for embedded network local retailers (ENLR)	

15.7, 18.7, 20.7, 21.9, 22.7, 23, 25.8, 26.7, 27.1, 28.1, 28.5		
5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7	Removal of Local Retailer (LR) references	
Various	Updated table and section references throughout the document	

9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	Section 2.2 (d): this clause effectively makes the population of LR mandatory for the LNSP. PLUS ES suggests this is an optional and call out the instances/conditions in which the requirement would be mandatory to update. i.e. Embedded network child, boundary connection point etc .
2.2	Provisions for embedded network local retailers (ENLR)	

2.4, 7	Provisions for non-contestable unmetered loads	
7, 9.3	Removal of net data and net datastream references	
3, 7.2	Provisions for 'bulk supply'	
7, 9.3	Removal of meter data to AEMO requirements	
7.1	Datastream Suffix for Accumulated Metering Data	PLUS ES suggests: (a) – adding *"noncontestable unmetered loads"* to the list of metering installations allowed for Accumulating Data Streams (as per the comment for MSATS Procedures section 4.12.1)

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	
2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, 103.2,	Provisions for embedded network local retailers (ENLR)	

105.3, Appendix 1		
6.1, 12	Removal of Second Tier references	
Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	

11.   Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
General	Version Release History Table	Typo: Effective Date should be 1 December 2020 not 2010.
1.3	Inclusion of additional related document	
2.4.1	Inclusion of 5 February 2022 reference	Clause 2.4.1 (a) (xii) B: PLUS ES suggests this clause to be removed. It contradicts Metrology Procedure B updates for GS, where Datastreams need to be made Active for first Tier Loads.
		Clause 2.4.1 (a)(xii) C.: PLUS ES suggests removing or alternatively making the action optional. Why is it a <u>must</u> to deactivate Datastreams for NMIs that are not abolished?

		Clause 2.4.1 (a)(xii) D.: PLUS ES suggests removing or alternatively making the action optional. Why is it a <u>must</u> to deactivate Datastreams for NMIs that are not abolished?
3.7.1	References to MDM format and MDMT transaction groups	
3.10, 3.11, 3.12.2	Provisions for 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	PLUS ES believes the obligations on the MDP to deliver metering data to AEMO are ambiguous. Clause 3.12.4, requiring the MDP to deliver 'all Datastreams' to AEMO, does not support commitments made by AEMO to allow MDPs to 'transition' to the NEM12 format. Further, PLUS ES encourages AEMO to reconsider its position with regard to the delivery of metering data to MSATS. In short, the delivery of metering data in the MDM format should be validated against the NMI Datastream, and the delivery of metering data in the NEM12 format should be delivered against the NMI Suffix recorded against the meter register. There are a number of reasons for this approach: - 1. Clause 2 (c) of the MDFF specification requires an MDP to include 'all NMI suffixes associated with a NMI for any IntervalDate' in the same 100-900 block. Experience tells us this does not always happen. Without validating all suffixes/registers are included for the IntervalDate, AEMO

		risks incorrectly calculating settlement data.
		2. Current recipients of the NEM12 file format typically validate against the registers. It would be prudent for AEMO to exercise similar validation to ensure consistency across the market.
		3. How will AEMO deal with the removal of a contributing suffix from a Net calculation? Whilst this is a relatively rare occurrence, a suffix being made inactive does not require metering data to be re-sent for the remaining suffix, and even if it were, it would be rejected on account of a duplicate version date/time.
		4. There is no reason why an MDP should be required to replicate information recorded in the meter register, information that forms part of the structure and validation of the NEM12 file, in the datastream table.
		5. And, at some time in the future, the datastream table should become redundant.
		If AEMO is to allow a transitional approach to the delivery of metering data, the obligations specified in MDL SLP clause 3.12.4 need to be modified such that they allow for, and articulate, the transitional arrangements.
3.12.4	Changes to metering data quantity and quality requirements	PLUS ES does not support the quantity and quality SLA for settlements ready data, as proposed in the table Section 3.12.4 (b). • There are always going to be some standing data or sync issues or long-term Comms faults that would prevent 100%. A 100% target will drive behaviours to final sub without recovering actual data.

Section	Description	Participant Comments
		• Manually Read Metering Data: there will be instances where endeavours to manually read these meters for one or more billing cycles produce no actual meter reads. • Current quantity and quality requirements for settlements ready data does not make a distinction between collection methods. For the reasons above PLUS ES proposes that the current values of 98% are maintained for Remotely Read Meter Data and a maximum for Manually Read Metering Data.
3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	

12.   Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		

13.　　Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	
2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage Requirements	
2.6.2	Inclusion of bulk supply and/or cross boundary references	PLUS ES notes that in this section bulk supply and cross boundary have been added but these have not been mentioned in the WIGS.
5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	PLUS ES notes that the below have not been amended in the Glossary: - Remove LR - Since the participant will not exist and ENLR has been added to the Glossary? - Remove Tier 1 Site - Remove Tier 2 Site - Remove from RoLR Event Affected MSATS Participant: 　o　If the Failed Retailer is a LR, the replacement LR.

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?	
• Will the proposed transitional arrangements assist MDPs and other market participants 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?	

Heading	Participant Comments
Non-contestable Unmetered Loads	

• 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?
 	
    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?	

Heading	Participant Comments
• 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?	
• What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why?	
Service Levels for Meter Data Provider Services	
• Will AEMO's proposed arrangements likely result in more accurate market settlements and why?	
• What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements?	

Heading	Participant Comments
Exemption Procedure: Metering Provider Data Storage Requirements	
• Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process for applying for a data storage exemption and why?	