

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: SA Power Networks

Submission Date: 24 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 |
|------------------------|--|----------------------|
| 12.3, 12.4, 12.7 | Provisions for non-contestable unmetered loads | No comment |
| 12.4 | Removal of 'First Tier' references | No comment |

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) | No comment |
| 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 | No comment |
| 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 | No comment |
| 11.2.1 | Removal of 'Local Retailer (LR)' references | No comment |

| Section | Description | Participant Comments |
|----------------------------------|---|----------------------|
| 11.3.3, 11.4, 12.4, 13.2.5 | Change in formulas | No comment |
| 11.4, 12.3 | Provisions for 'bulk supply' | No comment |
| 12.4 | Provisions for UFE (unaccounted for energy) | No comment |

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

| Section | Description | Participant Comments |
|---------|----------------------------------|----------------------|
| 1.1 | Include AEMO as a relevant party | No comment |

5. MSATS Procedures: MDM Procedures

| Section | Description | Participant Comments |
|---------|--|----------------------|
| 1.3 | Inclusion of the MDM File Format and Load Process document | No comment |

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|--|--|------------|
| 3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3 | Removal of 'First Tier' and 'Second Tier' references | No comment |
| 3.2.14, 3.2.16, 9.5, 9.6, 9.7 | Inclusion of five-minute provisions | No comment |
| 3.2.15, 3.2.16 | Provisions for 'bulk supply' | No comment |
| 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) | No comment |
| 3.2.16, | Removal of 'Local Retailer (LR)' references | No comment |
| 6.3, 6.4 | Removal of aseXML csv payload tag reference | No comment |
| 9.5 | Removal of MDM RM14 MDP Data Version Comparison report | No comment |
| 9.6 | Removal of MDM RM15 Multiple Versions report | No comment |
| 9.9 | Removal of MDM RM18 Electricity Interval | No comment |

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|------------|--|------------|
| | Data report | |
| Appendix A | Provisions for FTP and API delivery method | No comment |

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) | No comment |
| 1.3 | Inclusion of additional 'Related Documents' | No comment |
| 3.6 | Changes to table content | No comment |
| 3.7, 3.8, 3.9, 3.12, 4.4.1 | Removal of sections, including references to netting and aggregating to 30-minute | No comment |
| 3.8, 5.1 | Changes to MDMF content | No comment |
| 3.11 | Inclusion of file size references | No comment |
| 4 | Inclusion of Meter data messaging | No comment |

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|---------------------------------|--|------------|
| | exchange content | |
| 3.1, 3.3, 3.10, 3.12, 4.2 | Provisions for FTP and API delivery method | No comment |

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 | No comment |
| 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, 23.7, 25.9, 25.10, 27.7, 28.7, | Provisions for embedded network local retailers (ENLR) | No comment |

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|---|--|------------|
| 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 | No comment |
| 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 | No comment |
| 3.7.1, 3.7.2 | Changes in table references | No comment |
| 4.9 | Addition to and modification of NMI Classification Codes | No comment |
| 4.12 | Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code | No comment |
| 4.11.2, 4.17 | Provisions for UFE (unaccounted for energy) | No comment |
| Various | Updated table and section references throughout the document | No comment |

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 Chane Reason Code 1050, 1051, 6400 and 6401 | No comment |
| 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) | No comment |
| 5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7 | Removal of Local Retailer (LR) references | No comment |
| Various | Updated table and section references throughout the document | No comment |

9. National Metering Identifier

| Section | Description | Participant Comments |
|---------|--|----------------------|
| 2.2 | Updates to LR population e.g. 'GLOPOOL' | No comment |
| 2.2 | Provisions for embedded network local retailers (ENLR) | No comment |
| 2.4, 7 | Provisions for non-contestable unmetered loads | No comment |
| 7, 9.3 | Removal of net data and net datastream references | No comment |
| 3, 7.2 | Provisions for 'bulk supply' | No comment |
| 7, 9.3 | Removal of meter data to AEMO requirements | No comment |

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 | No comment |

| | | |
|--|--|------------|
| 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) | No comment |
| 6.1, 12 | Removal of Second Tier references | No comment |
| Appendix 1 | Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report | No comment |

11. Service Level Procedure: Metering Data Provider Services

| Section | Description | Participant Comments |
|---------|--|---|
| 1.3 | Inclusion of additional related document | No comment |
| 2.4.1 | Inclusion of 5 February 2022 reference | SA Power Networks suggest the following modification to Clause 2.4.1 (xii): the word “only” should be removed from the end of the first line as this will make the full intent of the clause clearer. |
| 3.7.1 | References to MDM format and MDMT transaction groups | No comment |

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|------------------------|---|--|
| 3.10, 3.11, 3.12.2 | Provisions for non-contestable unmetered loads | No comment |
| 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 | No comment |
| 3.12.4 | Changes to metering data quantity and quality requirements | SA Power Networks recommend that the Quantity & Quality of Manually Read Metering Data should remain at 98%, nothing has changed in this area as a result of MC to warrant a change in the delivery KPI's. |
| 3.12.5, 3.14.1, 3.14.2 | Changes to method of delivery of data | No comment |
| 5.1 | Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants | No comment |

12. Exemption Procedure: Metering Installation Data Storage Requirements

| Section | Description | Participant Comments |
|---------------|-------------|----------------------|
| New Procedure | | No comment |

13. Retail Electricity Market Glossary and Framework

| Section | Description | Participant Comments |
|------------|---|----------------------|
| 1.3 | Inclusion of an addition related document | No comment |
| 2.2, 2.7.7 | References to the Exemption Procedure: Metering Installation Data Storage Requirements | No comment |
| 2.6.2 | Inclusion of bulk supply and/or cross boundary references | No comment |
| 5 | Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms | No comment |

14. Other Issues Related to Consultation Subject Matter

| Heading | Participant Comments |
|--|----------------------|
| Implementing and transitioning to the changes in delivery of metering data to AEMO | |
| <ul style="list-style-type: none"> Do the proposed changes in the applicable initial draft change-marked procedures | No comment |

| Heading | Participant Comments |
|--|--|
| <p>implement the required changes in section 2.2.5 in an effective manner?</p> | |
| <ul style="list-style-type: none"> • Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new procedural requirements? | <p>No comment</p> |
| <ul style="list-style-type: none"> • 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? | <p>No comment</p> |
| <p>Non-contestable Unmetered Loads</p> | |
| <ul style="list-style-type: none"> • How should non-market/contestable unmetered loads be processed and maintained in MSATS? <ul style="list-style-type: none"> ○ Should non-contestable unmetered loads with | <p>In SA the vast majority of non-contestable unmetered loads with PE Cells are watchman lights, these should be included as Type 7's within the rules as in operation they are no different to a streetlight with their operating times and most lamp types are already included in the AEMO Load Table.</p> <p>In SA almost all non-contestable unmetered loads without PE Cells are flat loads so the requirement to produce interval data for these loads will achieve nothing other than expense and complexity to the MDP's system and process. The requirement should be amended to the</p> |

| Heading | Participant Comments |
|---|--|
| <p>photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads and why?</p> <ul style="list-style-type: none"> ○ 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? | <p>responsible MDP only providing a total aggregated consumption value for each NMI and then AEMO can apply an appropriate profile as required</p> |
| <ul style="list-style-type: none"> • 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? | <p>Each Non-contestable NMI assigned with a Metering Installation Type code of NCONUML should be setup within MSATS so that transfers and role changes are rejected.</p> |
| <ul style="list-style-type: none"> • What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads | <p>The existing Type 7 methodology should be used for those NMI's that require a load profile to be created (ie Watchman lights). All other non PE-Cell based loads could use similar methodology to create a monthly aggregated consumption figure.</p> |

| Heading | Participant Comments |
|---|----------------------|
| and why? | |
| Service Levels for Meter Data Provider Services | |
| <ul style="list-style-type: none"> Will AEMO's proposed arrangements likely result in more accurate market settlements and why? | No comment |
| <ul style="list-style-type: none"> What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements? | No comment |
| Exemption Procedure: Metering Provider Data Storage Requirements | |
| <ul style="list-style-type: none"> Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process for applying for a data storage exemption and why? | No comment |