FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

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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	Definititon of 'non-contestable unmetered loads' missing in Glossary.
12.4	Removal of 'First Tier' references	In Section 12.8.2 (a) and (c), there is a reference to 'first-tier controlled load' that needs to be reworded in line with section 12.4. There are references to first-tier loads all throughout section 3 that might also require amendments.

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	The only comment is around version control as also raised by other participants in last few workshops. Although it's trivial for the ones who are aware of the sequence of changes, from logical and administrative perspective, it's not appropriate to have v2.1 being made effective ahead of version 2.0 (which could be read as v2.0 is virtually effective from 1 Dec 2020, ahead of 5ms Rule Change). Since v2.0 is not officially effective yet (or published), Simply Energy suggests v2.1 to be renamed as v1.07 and markup to be done on v1.06 copy instead of v2.0 copy.

4. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
Appendix A	Provisions for FTP and API delivery method	Minor amendment to include 'API' reference in the below sentence: Following is a summary of the transactions for each participant in a metering data exchange to MDM, via FTP or e-Hub API, in order of operation.

5. MSATS Procedures: MDM File Format and Load Process

Section	Description	Participant Comments
3.11	Inclusion of file size references	Suggest inclusion of 'unzipped' in the below statement for consistency with current world: Participants must ensure that Messages containing aseXML Transactions do not exceed an unzipped and uncompressed Message size of 10 MB for MTRD and 10 MB for MDMT. Also the transaction limit of 1000 is a newer concept and would require changes in the backend (perhaps at the gateway during bunlding of transactions) so this needs to be tested during market-testing/trial phases and ensure that 1000 is a safe limit, else needs to be relooked. Hence, Simply Energy would suggest keeping '1000' as a arbitrary number until market testing has concluded. This could essentially be done by removing the transaction limit from 5ms Procedures and leaving it in the tech spec, unless AEMO is willing to make changes to the transaction limit at a later stage.

6. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
Various	Updated table and section references throughout the document	Section 40.3, remove the referece of 'The Tier Status (not required if both the LR and FRMP are provided as selection criteria)' Table 41 G and 41 I, the highlighted 'Description' to be amended as per ENLR changes for consistency: **Table 421-G – CATS Standing Data Access Rules for Participant Relations** PARTICIPANT RELATIONS **Table 421-I – NMI Standing Data Access Rules for Participant Relations** PARTICIPANT RELATIONS

Table 421-G – CATS Standing Data Access Rules for Participant Relations

PARTICIPANT RELATIONS

Jur'n	Data Item	Description	FRMP	LR	LNSP	MDP	MPB	MPC	RP	RoLR	NEMM	NSP2
ALL	FRMP	Financially Responsible *Market Participant*, e.g. Current Retailer.	Yes		Yes	Yes	Yes	-	Yes	-	Yes	Yes
ALL	LNSP	Current Local *Network Service Provider* (or ENM for a *child connection point*).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
ALL	LR	Current *local retailer*.	Yes	Yes	Yes	Yes	Yes	-	Yes	-	Yes	

Table 421-I – NMI Standing Data Access Rules for Participant Relations

PARTICIPANT RELATIONS

Jur'n	Data Item	Description	FRMP	LR	LNSP	MDP	MPB	MPC	RP	RoLR	NEMM	NSP2
ALL	FRMP	Financially Responsible Market Participant.	Yes	-	–	–	–	–	–	–	–	–
ALL	LNSP	Current Local Network Service Provider, or *Embedded Network Manager* for a *child connection point*.	–	–	–	–	–	–	–	–	–	–
ALL	LR	Current Local Retailer.	–	–	–	–	–	–	–	–	–	–

7. 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	Errata: 23. CHANGE ROLE – CHANGE LR ERROR! BOOKMARK NOT DEFINED. 23.1. Application [6400 6401] Error! Bookmark not defined. 23.2. Conditions Precedent Error! Bookmark not defined. 23.3. Initiating Roles Error! Bookmark not defined. 23.4. LR Requirements Error! Bookmark not defined. 23.5. Timeframe Rules Error! Bookmark not defined. 23.6. Objection Rules Error! Bookmark not defined. 23.7. Change Request Status Notification Rules Error! Bookmark not defined. Tabe of contents still has references to LR Requirements, e.g. section 24.4

8. National Metering Identifier

Section	Description	Participant Comments
2.4, 7	Provisions for non-contestable unmetered loads	Is section 6.2 still accurate?

9. NEM RoLR Processes – Part A

Section	Description	Participant Comments
2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, Appendix 1	Provisions for embedded network local retailers (ENLR)	Section 13, *'Embedded Network Local Retailer'* to be italicised.
6.1, 12	Removal of Second Tier references	Section 12.1 and 12.2 still has a number of references to 'Second tier' NMIs.

10.   Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	Typo: 2.0 1 December 2010 Updated to incorporate: National Electricity Amendment (Five Minute Settlement) Rule 2017 No.15 and National Electricity Amendment (Global settlement and market reconciliation) Rule 2018 No. 14
3.12.4	Changes to metering data quantity and quality requirements	Simply Energy agrees with the objective to improve market settlements by increasing data accuracy however the referece to 95% is a step backwards. The Quality of Settlements Ready Data ,

		regardless of the quality flag type should be left at 98% in Preliminary for RRIM and R1 for Manually Reads meters.
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	Scenario 1 'Type 6 replaced with a new type 6' and Scenario 3 'Internal meter with a new type 6' are no longer valid/practical scenarios as SAPN is no longer installing type 6s anymore despite it's reference in the South Australia Jurisdictional metrology material. Unless Scenario 1 is deleted from this document, there must be a statement upfront about the use-case of this scenario instead of in the 'comment' line.

11.   Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	Definititon of 'non-contestable unmetered loads' missing in Glossary.

12.   Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Implementing and transitioning to the changes in delivery of metering data to AEMO	
• Is including transitional arrangements in the relevant	Including transitional arrangement in the relevant procedure is perhaps effective however since these transitional clauses are short-lived and have a imited lifecycle, these are generally (as well as historically) included in a sub-section of each relevant clause with a

Heading	Participant Comments
procedures the most effective way of implementing transitional arrangements? If not, what would be the preferred alternative approach?	clear heading 'transitional requirement'. Along with this, there needs to be an overarching statement added at the beginning of the document to provide the affective date and ceasation of the transitional clauses.
Service Levels for Meter Data Provider Services	
• Will AEMO's proposed arrangements likely result in more accurate market settlements and why?	Feedback provided in the comments above.
• What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements?	Feedback provided in the comments above.