FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Vector Advanced Metering Systems*

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'Five-Minute Settlement Metering Procedure Changes – Package 2' Draft Procedures.

Please note, the change marked versions of the Draft Procedures highlights the changes required between the first stage Initial Draft Procedures and the second stage Draft Procedures.

The changes being proposed seek to enable 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
3.1	Requirements under National Measurement Act and Use of Standards	Agreed
3.4	"x" values – Calculation and Use	Agreed
12.3, 12.7	Provisions for non-contestable unmetered loads	No comment.

3. Metrology Procedure: Part B

Section	Description	Participant Comments
12.3	Profile Area five-minute load profile calculation	No comment
12.4	Applying the five-minute profile to 15-minute and 30-minute metering data for a Profile Area	No comment
13	Non-contestable unmetered loads	No comment
Various	Inclusion of the word “affected”	Agreed

4. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
3.2.15, 3.2.17	Unaccounted for energy (UFE)	No Comment
5.2	MDP Obligations	Agreed
6	LOAD DATA – INTERVAL NMI DATASTREAM	6.2.(b)(ii) indicates a CATS DataStream Type of ‘N’. Is this a new code? Standing Data for MSATS states:

		Table 12 - Valid Datastream Type Codes **Datastreamtype** / **Description** I – Interval C – Basic P – Profile Data 1 – Non-Market Active Import 2 – Non-Market Active 3 – Non-Market Reactive Import 4 – Non-Market Reactive
9.11- 9.14	MDM RM Reports	

5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.3	Local Network Service Provider	Agreed
Various	Reference to NMI Procedures Appendix E	Agreed
4.4	Use of LR/ENLR within this Procedure	Noted
4.10	NMI Classification Codes	Agreed.
4.12.2	Datastream Status Codes	Agreed.
4.13.1	Consequences of Allocating Certain	Indicates a CATS DataStream Type of 'N'. Is this a new code?

	Metering Installation Codes	It may be worth adding a table of valid DatastreamType code into the MDM procedure. Seems an obvious omission.
5	MSATS REPORTS	Agreed
Various	References to LR and ENLR	Agreed
11, 13, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 30, 31, 32, 39, 40	Inclusion of NCONUML	Agreed
Various	Updated table references	Noted

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

Section	Description	Participant Comments
1.4	WIGS Codes and Rules for a Change Request	Noted
Various	Inclusion of “NREG” NMI Classification Code	Noted
Various	Inclusion of “BULK” NMI Classification Code	Noted
Various	Inclusion of “XBOUNDRY” NMI	Noted

	Classification Code	
Various	Inclusion of “DWHOLSAL” NMI Classification Code	Noted
Various	Provisions for embedded network local retailers (ENLR)	Noted
Various	Removal of Local Retailer (LR) references	Noted

7. National Metering Identifier

Section	Description	Participant Comments
VRH	Effective date updated to 1 July 2021	Noted
Appendix E	Inclusion of appendix to better communicate NMI Classification and Role requirements	Noted
2.4	Allocation of NMIs for non-contestable unmetered loads	Noted
6	Changes to DATASTREAM SUFFIX	Noted
A.19, A.20	Non Contestable Unmetered Load – One NMI With Multiple Devices	Noted

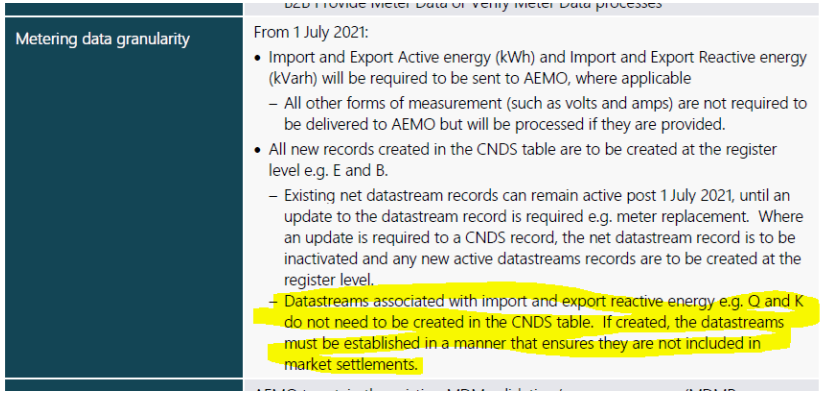
8. NEM RoLR Processes – Part A

Section	Description	Participant Comments
Various	Removal of first and/or second tier references	Noted
Various	Provisions for ENLR	Noted

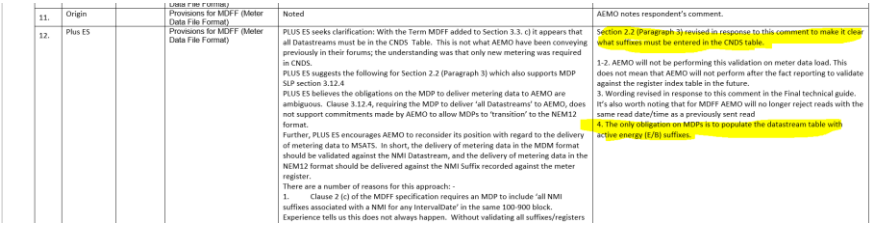
9. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
2.4	Specific obligations for MDP - Category D	Agreed
2.4(xiii)	Specific obligations for MDP - Category D	Mandatory deactivation of Datastreams should not apply if a MDP is to provide substituted meter data indicating that the site is deenergised i.e. Substitution types 19,58,68. Refer to Vector's submission to the ICF package changes. Suggested wording: (C) where the supply of electricity has been disconnected at the service fuse and the MDP will not be providing appropriately substituted metering data;
3.7	Metering Data Processing Requirements	3.7(f) requires MDP to ensure the 200 record of the MDFF is accurate. Current MDFF specification requires the MDMDataStreamIdentifier to be provided when data is to be sent to MSATs. AEMO have indicated that

there is no requirement to create Q,K datastreams in CATS_NMI_DATASTREAM. Refer to AEMO responses on MDM Load process and the determination from Metering package 1 below which is consistant with advice provided in other forums and responses



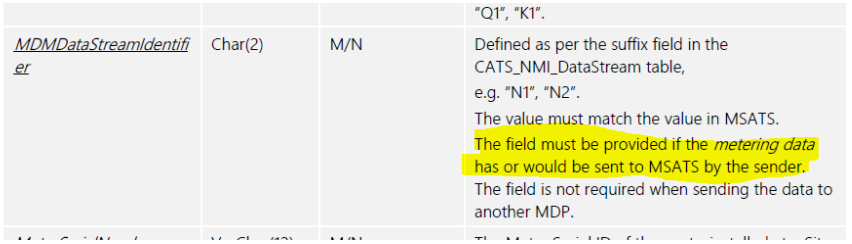
Metering data granularity	From 1 July 2021: • Import and Export Active energy (kWh) and Import and Export Reactive energy (kVarh) will be required to be sent to AEMO, where applicable – All other forms of measurement (such as volts and amps) are not required to be delivered to AEMO but will be processed if they are provided. • All new records created in the CNDS table are to be created at the register level e.g. E and B. – Existing net datastream records can remain active post 1 July 2021, until an update to the datastream record is required e.g. meter replacement. Where an update is required to a CNDS record, the net datastream record is to be inactivated and any new active datastreams records are to be created at the register level. – Datastreams associated with import and export reactive energy e.g. Q and K do not need to be created in the CNDS table. If created, the datastreams must be established in a manner that ensures they are not included in market settlements.



			Data File Format)		
11.	Origin		Provisions for MDFF (Meter Data File Format)	Noted	AEMO notes respondent's comment.
12.	Plus ES		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	Section 2.2 (Paragraph 3) revised in response to this comment to make it clear what suffixes must be entered in the CNDS table. 1-2. AEMO will not be performing this validation on meter data load. This does not mean that AEMO will not perform after the fact reporting to validate against the register index table in the future. 3. Wording revised in response to this comment in the Final technical guide. It's also worth noting that for MDFF AEMO will no longer reject reads with the same read date/time as a previously sent read 4. The only obligation on MDPs is to populate the datastream table with active energy (E/B) suffixes.

MDFF specification current wording requires all Datastreams to be created MSATs if data is to be sent to MSATS

MDFF Specifcation says:

		 "Q1", "K1". *MDMDataStreamIdentifier* — Char(2) — M/N — Defined as per the suffix field in the CATS_NMI_DataStream table, e.g. "N1", "N2". The value must match the value in MSATS. The field must be provided if the *metering data* has or would be sent to MSATS by the sender. The field is not required when sending the data to another MDP. Also the MDFF file can accommodate more than just the Active and Reactive datastreams e.g. Current (Z), PowerFactor (G) etc. Given that AEMO wants the file that is sent to the Retailer then this field needs to be optional as there is no requirement to create rows in the NDS table. Vector support the findings of Metering package 1 that it is not mandatory for MDP's to create K/Q datastreams in the NDS table.
3.10.2	Non-contestable Unmetered Load Calculation Methodologies and Agreed Loads	Is 'Agreed Loads' a defined term? If so, should be in italics otherwise shouldn't be in caps.
3.12.4	Delivery of Settlements Ready Data	AEMO should note that introducing a Quality SLA requirement for manually read meters will only incentivise the MDP to 'F'inalise substituted data where a read cannot be obtained on the NSRD. Current 'No Access' issues encountered by Vector for Manually read meters are at levels greater than 2% on any schedule read date. AEMO should note that having a SLA imposed for manually read meters for R1 effectievly means that the MDP **must** 'F'inalise any substitutes should MDP fail to read a meter at the scheduled reading data (NSRD) – otherewise they will fail the SLA.

		Having to generate 'F'inals only to replace them with Actuals when the access issue is resolved at the next NSRD appears to be somewhat inefficient. Vector recommends that a Quality SLA for manually read meters only be applicatble for R2 noting that the Quantity SLA will ensure a read for use in settlements is available.
3.12.5	Method of Delivery of Data	Agreed
5	METER CHURN DATA MANAGEMENT	Agreed

10. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
1.1	Purpose and scope	Noted
1.2	Definitions and interpretation	Noted
2	APPLICATION PROCESS	Unclear what second and third paragraph in FootNote 2 is trying to say. Is second paragraph relevant? Should 'No exemption will be required for type 4..' be 'No exemption will be granted by AEMO for type 4….'

11. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
2.7.7	Exemptions	Noted
5	GLOSSARY	Noted