METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: VectorAMS*

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the Metering ICF Package Changes consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.1.(l)	New section added to clarify the communication of the identification of incorrect NMI	k)(l) When a Participant becomes aware that CATS Standing Data related to a NMI is incorrect, that Participant must promptly notify other impacted Participants and the Participants must cooperate with each other to facilitate the correction of the CATS Standing Data. Vector does not support this change as drafted. As drafted, this will have the unintended consequence of capturing all issues related to standing data and not just the issue raised in ICF M004 to address a specific scenario where a transposed meter exists or where a meter is recorded against the incorrect NMI. Vector believes that obligations already exist under the rules (NER 7.9.2) and the MP and MDP SLP"D that cater for the intent of the ICF, therefore it is not necessary to introduce new clauses to reiterate what is already in place. For example,in order for a transposed meter to be recognised a site inspection is

Section	Description	Participant Comments
		required. NER 7.9.2 will be triggered and affected NMI's will have their standing data in MSATS updated and meter data will need to be reissued by the relevant MDP's as required by NER 7.10.2 (e) and other obligations in the MDP SLP's such as 3.7.2 Erronuous data and 3.7.1(g) notify participants of substitutions. Vector believes that MP/MDP/MC's already work closely with Retailers and LNSP's when resolving these issues but suggest the communication can be strengthen with a new Substitued Reason code in the MDFF file that can accompany the substituted meter data when it is re-issued - NER 7.10.2 (e). Participants can use this code in their processes to understand the cause for the changes in standing data and meter data. Should AEMo deem 2.1.(l) be required then alternate drafting is require to limit the obligation to the issue of transposed metering only.
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	The MDP will be unable to meet this obligation as it is currently drafted. The MDP can only be held to account once it has become aware that the site has been deenrgised/re-enrgised by the LNSP. Awareness is provided by monitoring the NMI Status code in MSATS. The prescedent for this is already well established numerous time in the CATS procedures -refer to clause 2.3.(j) and 2.2.(q) which shows oblgations on participants when other parties are involved. Current drafting should be changed to: a. Where an MDP is to update an Interval Datastream Status Code to 'I' (Inactive) for a *connection point* that is de-energised, the Proposed Change Date must be the day after the *connection point*

Section	Description	Participant Comments
		is de-energised within ~~two~~ five *business days* from the time the MDP become aware of the *connection point* being de-energised. (The Datastream Status Code is the key criterion used to include *metering data* in the *settlement* process). This change also needs to be considered along side the change requested by for ICF_M005 which is asking MDP to continue to read meters after a site has been deergised by the LNSP. While Vector is supportive of ICF_M005, it is Vectors position that should this ICF proceed the most efficient process is for the datastream to remain active and the MDP to send Subs zero indicating a 'D'e-energised site (reason code 6) – See section 10 below for more detail.
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	Obligations should require 5 days to update MSATs from when MDP becomes aware of a change in status. See comment for 2.4.(c)
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	Obligations should require 5 days to update MSATs from when MDP becomes aware of a change in status. See comment for 2.4.(c)
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	Similarly to comments on 2.4.(c) it is not the MDP who is installing the meter therefore the allocation of the Datastreams cannot be performed until the MP has informed the MDP that the metering work has been completed. Obligations on the MDP can only commence once it has been made aware the metering is in place. In addition, currentl obligations on the LNSP and the MP require standing data

Section	Description	Participant Comments
		updates to be completed within 5 business days. It is only reasonable that the MDP is also given this amount of time. Suggest the current drafting be change to:- (f) Create or update the datastream within ~~two~~ five business days from the time the MDP becomes aware that the meter is installed/removed/reconfigured or as required when the MDP becomes the Current MDP.
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	Agreed
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	Agreed
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	Agreed
4.18	Updated to clarify the LNSP's obligations in relation to creating Embedded Network Codes and ENM's obligations in relation to application of the Embedded Network Code and data provided to AEMO upon appointment.	Agreed

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	Agreed

4. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1.(a)	Update to remove the word 'relevant'	Agreed
3.1.(b)	Update to remove the word 'relevant'; add requirements of AS60044.3 or IEC61869.1 and IEC61869.2; and detail what each topic the part of the standard covers	Agreed
3.1.(c)	Update to remove the word 'relevant'; add requirements of IEC61869.1 and IEC61869.3; and detail what each topic the part of the standard covers	Agreed
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	Agreed
12.5.(a)	Removal of obsolete standard AS2490	Agreed
12.5.(b)	New section added to detail Sample Test Plan settings	Agreed
12.5.(c)	New section added to specify when a test sample is deemed to have passes the verification test	Agreed
12.5.(d)	New section added to specify when the steps to be followed after each round of	Agreed

Section	Description	Participant Comments
	verification	
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	Agreed

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	Agreed
5.3.9	Type 69 – Linear Interpolation	The use of ADLin this drafting is confusing as ADL refers to the Avergae Daily Load allocated to the datastream and contained within the CATS_NMI_DATA_STREAM table in MSATs. It is Vectors understanding that this is a different ADL (one between two actual reads). Suggest replacing ADL with load. E.g. To perform a type 69 Substitution, the MDP must calculate the ~~ADL~~ load between two validated Meter Readings and apply this ~~ADL~~ calculated load pro-rated to the number of days for the substituted read.

6. Service Level Procedure Meter Data Provider Services

Section	Description	Participant Comments
2.4.1.(ix)	New section added to define an obligation to activate datastreams when energy is recorded from a metering installation while the NMI status is not Active	Ok with this drafting but the issue related to requiring the Data stream status to reflect whether there is usage at a site is outstanding. Refer to item 2.4.(c) above and section 10 below.
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	Ok with this drafting but the issue related to requiring the Data stream status to reflect whether there is usage at a site is outstanding. Refer to item 2.4.(c) above and section 10 below.
4.2.(g)	Amend outdated rule reference	Agreed
6.4.1.(c)	Amend outdated rule reference	Agreed
7.3.(b)	Amend outdated rule reference	Agreed

7. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2.(a)(iii)	Amend outdated rule reference	Agreed
5.2.(a)	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Agreed

8. Service Level Procedure Embedded Network Manager

Section	Description	Participant Comments
2.1.2.(d)	New section added to define an obligation that the EN for which the ENM has been appointed has an exemption by the AER.	No Comment
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	No Comment
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	No Comment

Section	Description	Participant Comments
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	No Comment

9. Exemption Procedure Meter Installation Malfunctions

Section	Description	Participant Comments
1.1.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Agreed
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Agreed
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Agreed
Appendix B	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Agreed

10. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Are there better options to accommodate the change proposals, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?	Vector believes the changes proposed to meet ICF_M005 are contradictory with other obligations. ICF_M005 effectly requires the MDP to continuing to read a meter yet other obligations require the MDP's to 'deactivate' the datastream in MSATs when the LNSP has indicated it has deneergised the site. New obligations in this consultation then require MDPS' to 'reactivate' the datastream should it detect usage. The net result will be that there will be legitimately 'Active' Datastreams on 'Deeenrgised' NMI's. Vector questions this directions and believes that should MDP's be required to continued to attempt to read meters regardless of energisation status then the obligations to maintain NMI Datastream status should be reviewed. It is already common for MDP's to continue to read meters regardless of energisation status indicated by the LNSP. Where communications to the meter are established participants will receive this data. Where comms is not established substituted data is provided with an appropriate reason code. This data is not sent to AEMO due to validation rules in CATS which will reject this due to NDS status code which must be consistant with the energisation status. Proposed changes for ICF_M005 and ICF_008 layer new obligations on already complex set of rules. Vector believes this area could be simplified and made more transparent by removing the requirements on MDP's to constantly change DataStream Status as sites are throetically 'denergised' and 'energised', or when load is detected as proposed by ICF 005. MDP's should be required to provide all data they collect from a meter that is registered in MSATS regardless of any statuses in CATS tables and where communications is lost - presumably

Heading	Participant Comments
	as a result of a 'deenergisation' by the LNSP - the MDP can provide substitutes with an appropriate reason code e.g.. 6 – deenergised site. Taking this simplified approach has the following advantages. 1) No complex process required to update standing data based on the NMI status and whether a remote meter can be communicated with or not. 2) Any usage that is collected from a nominally de-energised site will automatically be visible to retailers and LNSP's so that Retailers can commence processes to engage with the customer and that LNSP can bill for usage. 3) Any usage that is collected from a nominally de-energised site will be accepted by AEMO and included settlements - Datastream will always be active in MSATS but should it truly be de-eenrgised then usage will be zero.Note, for remote deenergisations the meter remains active and readable but the site is effectly deenergised with zero usage. 4) Reduced overhead for MDP's who currently send data to market for 'de-energised' sites – no need to update Data stream status. Note: this is already cumbersome and error prone which is reflected in the MDP 'Active meter with no active Datastream' monthly performance report.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	ICF_M005 will require system changes to monitor usage in the Meter Data Management Systems and trigger the updating of the DataStream status from the Market system. The complexity to meet this requirement is yet to be determined but given that industry has a program of work already underway for 5MS Vector requests that this change be deferred to coincide the the 5MS

Heading	Participant Comments
	program of work to leverage the one development team.