METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: TasNetworks

Submission Date: 20 June 2019

Table of Contents

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	2.1(i): TasNetworks notes a change also made to clause 2.1(i). The word 'it' should be 'they are'. TasNetworks agrees with the change from 20 business days to 10 business days. 2.1(l): Agreed
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	2.4(c): with reference to 2.3(h), the MDP is dependent on being informed of a change in NMI status, which may take up to 5 business days. TasNetworks recommends that the obligation on the MDP should be to update the data stream(s) within 2 days of receiving the MSATS CR Completed Notification informing of the NMI status change.
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	2.4(d): with reference to 2.3(h), the MDP is dependent on being informed of a change in NMI status, which may take up to 5 business days. TasNetworks recommends that the obligation on the MDP should be to update the data

Section	Description	Participant Comments
		stream(s) within 2 days of receiving the MSATS CR Completed Notification informing of the NMI status change.
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	2.4(e): with reference to 2.3(h), the MDP is dependent on being informed of a change in NMI status, which may take up to 5 business days. TasNetworks recommends that the obligation on the MDP should be to update the data stream(s) within 2 days of receiving the MSATS CR Completed Notification informing of the NMI status change.
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	2.4(f): The MDP may not be aware of a need to create or update data stream(s) until receipt of a MSATS CR Completed Notification, therefore the two business days should commence from the time the MDP is made aware, either from a MSATS CR or from notification by the MPB (e.g. upon commissioning a new meter).
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	2.4(h): Agreed, but with reference to 2.4(c) to (f) as noted above.
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	2.5(a): it is not the 'connection point' that is de-energised, it is the meter. The clause should be rewritten to reflect this. Otherwise TasNetworks agrees with the definition of the proposed date.
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	2.5(b): it is not the 'connection point' that is re-energised, it is the meter. The clause should be rewritten to reflect this. Otherwise TasNetworks agrees with the definition of the proposed date.

Section	Description	Participant Comments
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.	4.18(b)iv: Agreed 4.18(d): Agreed 4.18(f): 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	Addition of substitution type 69: Linear Interpolation	Type 69 needs to be added to section 5.2.1(d)(i) and needs a 'When to use' section in section 5.2 (would be 5.2.7 if added at the end). The 'When to Use' section could say: "When to use Type 69 Substitution: When a validated actual read for an accumulation meter has a reading that is lower than the previous substituted read, then the MDP may re-substitute the reading using the liner interpolation method whereby the reading is calculated using the ADL between 2 validated meter readings and applying this ADL 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	Agreed
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	Agreed
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.	In 4.2.1(e), the (e) should be (d). Otherwise, no comment.

Section	Description	Participant Comments
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	No comment
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	Agreed

Section	Description	Participant Comments
	rectification.	

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?	TasNetworks agrees with the change proposals, taking into account the comments provided in this document.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	TasNetworks does not foresee any challenges in implementing the proposed changes.