



10 September 2020

Ms Audrey Zibelman  
Chief Executive Officer and Managing Director  
Australian Energy Market Operator  
GPO Box 2008  
Melbourne VICTORIA 3001

Email to: [NEM.Retailprocedureconsultations@aemo.com.au](mailto:NEM.Retailprocedureconsultations@aemo.com.au)

Dear Ms Zibelman

### **Metering ICF Package**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the Metering ICF Package Consultation. This submission is provided on behalf of Energy Queensland's related entities, Energex Limited (Energex), Ergon Energy Corporation Limited (Ergon Energy), Ergon Energy Queensland Pty Ltd (Ergon Energy Retail), and Yurika Pty Ltd (Yurika).

Energy Queensland's comments in response to the consultation questions are included in the attached response template.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact either myself or Barbara Neil on 0429 782 860.

Yours sincerely

A handwritten signature in black ink that reads "Trudy Fraser".

Trudy Fraser  
**Manager Regulation**

Telephone: 0467 782 350  
Email: [trudy.fraser@energyq.com.au](mailto:trudy.fraser@energyq.com.au)

***Encl: Energy Queensland comments to consultation questions***

# METERING ICF PACKAGE CHANGES

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Ergon Energy, Energex, MDYMC, MDYMP,  
MDYMDP, MDYENM

***Submission Date:*** 11 September 2020

# Table of Contents

- 1. Context ..... 3
- 2. MSATS Procedures: CATS ..... 3
- 3. MSATS Procedures: WIGS..... 4
- 4. Metrology Procedure: Part A..... 4
- 5. Metrology Procedure: Part B..... 5
- 6. Service Level Procedure Meter Provider Services ..... 6
- 7. NEM RoLR Processes Part A and Part B..... 6
- 8. Meter Data File Format Specification..... 7
- 9. Standing Data for MSATS..... 8
- 10. Retail Electricity Market Procedures – Glossary and Framework ..... 8
- 11. Other Issues Related to Consultation Subject Matter..... 9

## 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
2.4.(s)	Updated to include a new sub clause(s) for obligation on MDP to provide relationship mapping between Register ID and Datastream Suffix.	Ergon Energy and Energex seek clarity as to how this relationship mapping information is to be provided by MDPs to AEMO / relevant Participants.
2.9.(k)	Updated to include a different timeframe for cancelling an incomplete CR6800.	No comment.
4.3 Table 4-C	Updated 'Description' for Code 'BADPARTY' for current MC to object to change of MC for SMALL NMI's only in Victoria.	No comment.
4.4 Table 4-D	Updated to reflect the current jurisdictional requirements for Small and Large customers.	No comment.

Section	Description	Participant Comments
13.3.6 Table 13-H	New entry related to objection code 'BADPARTY' for CR6300 and CR6301.	No comment.

### 3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	No comment.

### 4. Metrology Procedure: Part A

Section	Description	Participant Comments
12.5	Update to replace 'verification' with 'Validation'.  Amend the section heading and introduction paragraph to better align with terminology used in SLP MP clause 4.2(b)	No comment.

## 5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.4	Update to remove 'N' Metering Data Quality Flag	No comment.
13.2.2(a)(v)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	No comment.
13.3.2(a)(ii)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	No comment.
13.5.2(a)(v)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	No comment.

## 6. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2(a)(iii) & (b)	Update to replace 'verification' with 'Validation'.	No comment.
4.2(c)(ii) & (d)	Update to replace 'verify' with 'Validate'.	No comment.
4.4	Update to replace 'verify' with 'confirm'.	No comment.

## 7. NEM RoLR Processes Part A and Part B

Section	Description	Participant Comments
17.2(a)	Updated to change the section from 19 to 16.	No comment.
17.2(b)	Updated to include 'AEMO must' in the sub clause.	No comment.
17.2(c)	Include new sub clause to remove MSATS access for the Failed Retailer.	No comment.

## 8. Meter Data File Format Specification

Section	Description	Participant Comments
3.3.1(b)	Updated to remove the sub clause (b).	No comment.
4.4	<p>Updated to remove the text in Definition column related to Meter Data Quality Flag 'N' against the Field InternalValue1....InternalValueN</p> <p>Updated to remove 'N' from Allowed Values against the Fields QualityMethod and ReasonCode</p> <p>Updated to remove the text in Definition column related to Quality Flag 'N' against Field UpdateDateTime</p>	No comment.
4.5	Updated to remove 'N' from Allowed Values against the Fields QualityMethod and ReasonCode	No comment.
Appendix C	Update to remove the row related to Quality flag 'N'.	No comment.

## 9. Standing Data for MSATS

Section	Description	Participant Comments
8.1	Amend the description of Average Daily Load in Table 15	Ergon Energy and Energex would prefer the definition of Average Daily Load to be expanded to include details on rounding considerations where the value of the daily load is less than 1, e.g. NCONUML.  We support AEMO's decision to have no decimal place in this field.
9.1	Amend the description of RegisterID in Table 18	No comment.

## 10. Retail Electricity Market Procedures – Glossary and Framework

Section	Description	Participant Comments
5	Amend definition of the term Average Daily Load (ADL).	Ergon Energy and Energex would prefer the definition of Average Daily Load to be expanded to include details on rounding considerations where the value of the daily load is less than 1, e.g. NCONUML.  We support AEMO's decision to have no decimal place in this field.

## 11. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
<p>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?</p>	<p>No comment.</p>
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>Dependent on the timeframe set for delivery of this change package, we see the main challenge as being availability of resources and integration of works into current work programs, as required to develop and test the necessary market and in-house system changes (including any applicable industry testing), given the high levels of change currently underway or proposed for the industry.</p> <p>To assist with managing this challenge, we feel this change package should be included in the Regulatory Implementation Roadmap to ensure industry is aware of the changes and that any possible synergies or conflicts with other change projects can be identified.</p>