

# METERING ICF PACKAGE CHANGES

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

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<https://www.aemo.com.au/consultations/current-and-closed-consultations/metering-icf-package>

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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
2.4.(s)	Updated to include a new sub clause(s) for obligation on MDP to provide relationship mapping between Register ID and Datastream Suffix.	<p>Disagree with addition.</p> <p>AEMO need to do a data cleanse with existing MPB’s to update missing or N1 MDM Contributory Suffix values, as these are legacy issues.</p> <p>Obligation should be that the MDP notifies the MPB as per 2.4(r) and the MPB updates MSATS with the correct values in the field “MDM Contributory Suffix” in the Cr30xx (which is what they do now for each register) which then matches the MDFF 200 line RegisterID and NMISuffix (which is what they do now) and then eventually the MDMDataStreamIdentifier (which will be E1,Q1 etc) also.</p>
2.9.(k)	Updated to include a different timeframe for cancelling an incomplete CR6800.	Agree with change
4.3 Table 4-C	Updated ‘Description’ for Code ‘BADPARTY’ for current MC to object to	No comment

Section	Description	Participant Comments
	change of MC for SMALL NMI's only in Victoria.	
4.4 Table 4-D	Updated to reflect the current jurisdictional requirements for Small and Large customers.	<p>Disagree with change.</p> <p>The National Energy Retail Regulations (and NERL &amp; NERR) were created for Consumer Protections and contractual arrangements, thus setting the boundaries on what retailer and distributor standing offers and contracts were applicable. It was questioned during the consultation process 2011 why these were not aligned to metrology levels. Answer was the above. From these Rules, new fields were added to MSATS to accommodate the thresholds (CTC and CCC).</p> <p>The NER v76 had the classification of Small and Large Customers added (Nov 2015) that referred to the NERL for the first time.</p> <p>Does this mean that the CATS Procedures, and MSATS, have been non-compliant since then? I say no as this CATS clause is non-relational to contractual thresholds, but aligned to metering type thresholds.</p> <p>Aligning this will mean that all Residential customers must be classified as Small (see NERL Sec 5), regardless of their connection size or consumption level. This means new transfer rules, new reports etc that AEMO must put in place to ensure this applies. I thought MSATS was agnostic to Residential or Commercial?</p>

Section	Description	Participant Comments
		<p>It also means you need a new classification for those small business customers between 40 and 100 MWh. Must now introduce new category of "MEDIUM". Must now have new transfer rules to apply to this category.</p> <p>This will add duplicate locations now with CTC and NMI Clasification. Remove the CTC as it is no longer required.</p> <p>Will this trigger a Metrology Threshold Breach as it is linked to same field and values? Are Retailers ready for the large volume of MFIN that will come from this?</p>
13.3.6 Table 13-H	New entry related to objection code 'BADPARTY' for CR6300 and CR6301.	Agree with change

### 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	<p>Update to replace 'verification' with 'Validation'.</p> <p>Amend the section heading and introduction paragraph to better align with terminology used in SLP MP clause 4.2(b)</p>	<p>Agree with change</p> <p>Please reconsider if the heading and first sentence here is relevant. If you removed the word "Data" from the heading and add it the first sentence, it would make this clause a lot more relevant to what the requirements are below. Alternatively have "...metering and metering data..." as the header</p> <p>Suggested Header</p> <p>Validation of Metering for whole current Small Customer Metering Installations, Manually Read Metering Installations Type 4A, 5, 6, and Type 7 Metering Installations</p> <p>First sentence to now read</p> <p>To facilitate the Validation of <i>metering and metering data</i>:</p>

## 5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.4	Update to remove 'N' Metering Data Quality Flag	Strongly Agree
13.2.2(a)(v)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	Strongly endorse change
13.3.2(a)(ii)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	Strongly encourage change
13.5.2(a)(v)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	Strongly support this change

## 6. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2(a)(iii) & (b)	Update to replace 'verification' with 'Validation'.	Agree with change
4.2(c)(ii) & (d)	Update to replace 'verify' with 'Validate'.	Agree with change
4.4	Update to replace 'verify' with 'confirm'.	Agree with change

## 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.	Agree
17.2(b)	Updated to include 'AEMO must' in the sub clause.	Agree
17.2(c)	Include new sub clause to remove MSATS access for the Failed Retailer.	Agree

## 8. Meter Data File Format Specification

Section	Description	Participant Comments
3.3.1(b)	Updated to remove the sub clause (b).	Strongly agree with changes
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>	Agree with changes
4.5	Updated to remove 'N' from Allowed Values against the Fields QualityMethod and ReasonCode	Agree with changes
Appendix C	Update to remove the row related to Quality flag 'N'.	Agree with changes

## 9. Standing Data for MSATS

Section	Description	Participant Comments
8.1	Amend the description of Average Daily Load in Table 15	Change validated
9.1	Amend the description of RegisterID in Table 18	Agree with change
9.1	Amend the description of Suffix in Table 18	<p>Need to remove the dot points to align with wording in RegisterID</p> <p>Wording in first and second paragraph needs fixing. Suggested changes</p> <p>The Suffix field in the CATS_REGISTER_IDENTIFIER table is used to identify a physical data source that is obtained from the meter. The value in the Suffix field must match a valid Datastream suffix specified in the NMI Procedure.</p>

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

Section	Description	Participant Comments
5	Amend definition of the term Average Daily Load (ADL).	Agree

## 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>MSATS Procedures 4.4</p> <p>Why not just change the system and procedures so that an MC cannot nominate itself as the new MC where CTC is not "High".</p> <p>Use CTC for MC change limitations, if CTC = HIGH, allow, else REJ.</p> <p>This leaves all other validations in place for all other transfer types.</p>
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	