METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services

Submission Date: 11 September 2020

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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.	AusNet Services challenges the need to provide this mapping since the Register_Identifer table explicitly provides the relationship between RegisterID and Datastream Suffix for Interval meters. MDPs already have an obligation to now provide register level data under 5MS which further enhances the population of this table. The proposed obligation does not describe the form, or manner, in which the relationship mapping between Register ID and Datastream Suffix is to be provided. What does this mapping entail? Through what mechanism will the MDP convey the Register ID to Datastream Suffix relationships to AEMO and how often?

Section	Description	Participant Comments
2.9.(k)	Updated to include a different timeframe for cancelling an incomplete CR6800.	No Issue with this amendment
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 Issue with this amendment
4.4 Table 4-D	Updated to reflect the current jurisdictional requirements for Small and Large customers.	No Issue with this amendment
13.3.6 Table 13-H	New entry related to objection code 'BADPARTY' for CR6300 and CR6301.	AusNet Services supports the reinstatement of BADPARTY objection code to allow the current MC to object to a change of Responsible Person (RP) role where the NMI classification is 'SMALL' for Victoria only. Making this change gives Victorian DNSPs the ability to correct retailer or MC breaches of the Victorian Electricity Industry Act, without initiating change requests as MC to appoint themselves as new MCs via change code requests 6300 and 6301, which may contravene the CATS procedures.

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	No Issue with this amendment

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)	Changes to section 12.5 of the Metrology Procedure Part A may inadvertently remove the sample testing metering verification obligation from AMI meters, and therefore require more onerous on-site verification coordinated with back office staff, as required by the MDP SLP 4.2 when conditions for clause 4.2(b) are not met. The proposed obligation to data validate (verify) "all Vic AMI Meters" at time of commissioning (i.e. all New and Replacement meters) lifts the data verification volumes to at 15-20,000 per year. This is well in excess of the 3,000 per year undertaken currently across all 3 Networks under the existing 12.5 sampling regime. Sample Metrology Testing and sample Verification Testing, have been accepted approaches for all whole current "mass market" metering assets, there is no justification to now exclude the VicAMI Meters from those testing regimes.

Section	Description	Participant Comments
		AusNet Services does not consider that there is any requirement identified in the NER, that should require AEMO to now cause remotely read whole current Vic AMI Meters to be treated differently to Whole Current Small Customer Metering Installations, or in fact different to a Manually read Vic AMI Meter in terms of performing sample Verification/Validations. We believe this was not intended with the proposed change, and accordingly we recommend the words "type 4A, 5 and 6" to "manually read metering installations", or alternatively making refer to VIC AMI specifically. AusNet Services considers that "verification" is still suitable wording under section 12.5. Obligations to verify metering data are effective in ensuring MCs undertake all necessary checks. Replacing verification with Validation may just imply the use of MDP Validation rules on metering data collected. Counterintuitively, this may result in less robust processing of sample tests. What are AEMO's intentions and expectations by introducing "Validation" as a term in this section? Please explain and specify.

5. Metrology Procedure: Part B

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

6. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2(a)(iii) & (b)	Update to replace 'verification' with 'Validation'.	Changes to section 4.2 of the MDP SLP would have perverse and costly implications. The new obligation to Validate meter data when commissioning a meter would be costly as it increases meter testing for AusNet Services almost five-fold. AusNet Services considers that "verification" is still suitable wording under section 12.5. Obligations to verify metering data are effective in ensuring MCs undertake all necessary checks. Replacing verification with Validation may just imply the use of MDP Validation rules on metering data collected. Counterintuitively, this may result in less robust processing of sample tests. What are AEMO's expectations by introducing "Validation" as a term in this section? Please explain and specify.
4.2(c)(ii) & (d)	Update to replace 'verify' with 'Validate'.	Changes to section 4.2 of the MDP SLP would have perverse and costly implications. The new obligation to Validate meter data when commissioning a meter would be costly as it increases meter testing for AusNet Services almost five-fold.

		AusNet Services considers that "verification" is still suitable wording under section 12.5. Obligations to verify metering data are effective in ensuring MCs undertake all necessary checks. Replacing verification with Validation may just imply the use of MDP Validation rules on metering data collected. Counterintuitively, this may result in less robust processing of sample tests. What are AEMO's expectations by introducing "Validation" as a term in this section? Please explain and specify.
4.4	Update to replace 'verify' with 'confirm'.	No Issue with this amendment

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 Issue with this amendment
17.2(b)	Updated to include 'AEMO must' in the sub clause.	No Issue with this amendment
17.2(c)	Include new sub clause to remove MSATS access for the Failed Retailer.	No Issue with this amendment

8. Meter Data File Format Specification

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

9. Standing Data for MSATS

Section	Description	Participant Comments
8.1	Amend the description of Average Daily Load in Table 15	What is the expectation of ADL for reactive datastreams and should this be explained within the ADL definition?
9.1	Amend the description of RegisterID in Table 18	Fully support change and amendment as stated to the RegisterID Definition. The proposed change is important in reducing unnecessary complex requirement of matching each RegisterID to Suffix, whilst replacing it with a mapping obligation. This change would avoid unnecessary costs across Registered Participants. However, the drafting in the initial draft procedures does not fully incorporate the required changes. The definition to the Suffix still states: "For Interval Meters, the Suffix in the CATS_REGISTER_IDENTIFIER table must match the RegisterID in the CATS_REGISTER_IDENTIFIER table. E.g. 'E1', 'B1' This statement should be removed (as per the removed statement within the RegisterID definition) or amended to be like Basic Meters. Otherwise it contradicts the intent of the ICF change proposal.

10. Retail Electricity Market Procedures – Glossary and Framework

Section	Description	Participant Comments
5	Amend definition of the term Average Daily Load (ADL).	What is the expectation of ADL for reactive datastreams (since register level data is now to be provided to AEMO) and should this not be explained within the ADL definition?

11. 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?	Within Customer Switching version of the MDFF specification, there is a new ReasonCode 67 stated, this has not been included in the ICF Consultation version of the MDFF specification document.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Proposed changes in this consultation are largely non-controversial and should not result in major implementation challenges for the industry.