

# METERING ICF PACKAGE CHANGES

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

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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.	We are not clear on the mapping logic. We request further information.
2.9.(k)	Updated to include a different timeframe for cancelling an incomplete CR6800.	The increase from 220 days to 730 seems an excessive timeframe to keep CRs open. We propose the timeframe to be increased to 365 days.
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.	
4.4 Table 4-D	Updated to reflect the current jurisdictional requirements for Small and Large customers.	

Section	Description	Participant Comments
13.3.6 Table 13-H	New entry related to objection code 'BADPARTY' for CR6300 and CR6301.	

### 3. MSATS Procedures: WIGS

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

### 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)	AEMO has excluded whole current Victorian AMI Metering installations from accessing section 12.5 of the procedure, by removing reference to type 5 metering and replacing it with terminology relating to "Manually Read Metering Installations", but retaining "whole current small customer metering installations". We do not support AEMO's decision to exclude whole current Victorian AMI Meters from the sample based Validation

Section	Description	Participant Comments
		<p>processes laid out in section 12.5 of the Metrology Procedure A, nor the sample based Verification/Validation processes laid out in clause 4.2 (a) (iii) of the SLP Metering Provider Services.</p> <p>We note Victorian AMI metering installations are not <i>small customer metering installations</i>, as defined by the NER. The procedures must allow AMI meters to be validated as per the requirements of Service Level Procedure Metering Provider Services clause 4.2(a)(ii).</p> <p>We propose the below amendment to include VIC AMI in 12.5.</p> <p><b>12.5. Validation of Metering Data for whole current Small Customer Metering Installations, whole current Vic AMI installations, Manually Read Metering Installations and Type 7 Metering Installations</b></p> <p><u>Unless the Metering Coordinator has developed an asset management strategy that meets the intent of this clause and is approved by AEMO, the validations must be in accordance with this clause.</u></p> <p>To facilitate the Validation of <i>metering data</i> for whole current <i>small customer metering installations</i>, <u>whole current Vic AMI installations</u>, manually read <i>metering installations</i> and type 7 <i>metering installations</i>:</p> <p>(a) Each MC must ensure that a Sample Test Plan is established and maintained in accordance with <i>Australian Standards</i> “AS 1199: Sampling procedures for inspection by attributes – Sampling schemes indexed by Acceptance Quality Limit (AQL) for lot-by-lot inspection”.</p> <p>(b) Each MC must ensure that the Sample Test Plan is set at General Inspection Level II and initially selected to be a normal inspection sample size using an AQL of 1.5, <u>or Special Inspection Level S4 with AQL 1.0.</u> *</p>

Section	Description	Participant Comments
		<p>Note* This reflects Jemena’s existing sampling rate based on its already approved Variables Sample Testing.</p> <p>The references to an approved asset management strategy in 12.5(i) above and 4.2 (a) (iv) below would remove the need to explicitly address it within 12.5 (b).</p>

## 5. Metrology Procedure: Part B

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



## 6. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2(a)(iii) & (b)	Update to replace 'verification' with 'Validation'.	
4.2(c)(ii) & (d)	Update to replace 'verify' with 'Validate'.	
4.4	Update to replace 'verify' with 'confirm'.	
4.2	Metering Data Validation Requirements	<p><b>4.2. Metering Data Validation Requirements</b></p> <p>The MP must develop, maintain and operate processes and procedures for the Validation of <i>interval metering data</i> with the Metering Data Provider (MDP) upon the installation or alteration of that <i>metering installation</i>, which must include processes to ensure that:</p> <p>(a) Where a <i>metering installation</i> has <i>remote acquisition</i> capability:</p> <p>(iii) For whole current <i>small customer metering installations</i>, <u>and whole current Vic AMI installations</u>, <i>metering data</i> is <b>verified</b> in accordance with section 12.5 of Metrology Procedure: Part A; <u>or</u></p> <p>(iv) <u>Otherwise in accordance with the Metering Coordinators asset management strategy that meets the intent of this clause and is approved by AEMO.</u></p>

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

## 8. Meter Data File Format Specification

Section	Description	Participant Comments
3.3.1(b)	Updated to remove the sub clause (b).	We propose this change is made as part of the 5MS work program.
4.4	Updated to remove the text in Definition column related to Meter Data Quality Flag 'N' against the Field InternalValue1....InternalValueN	We propose this change is made as part of the 5MS work program.

Section	Description	Participant Comments
	<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>	
4.5	Updated to remove 'N' from Allowed Values against the Fields QualityMethod and ReasonCode	We propose this change is made as part of the 5MS work program.
Appendix C	Update to remove the row related to Quality flag 'N'.	We propose this change is made as part of the 5MS work program.

## 9. Standing Data for MSATS

Section	Description	Participant Comments
8.1	Amend the description of Average Daily Load in Table 15	
9.1	Amend the description of RegisterID in Table 18	The removal of the detailed description may lead to mistakes and remove the clarity it currently provides on meter identifiers.

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

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

## 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?	
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	