METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Endeavour Energy*

Submission Date: *26/10/2020*

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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 (v4.94)

Section	Description	Participant Comments
4.4 Table 4-D	Updated to reflect the current jurisdictional requirements and definitions of Small and Large customers. AEMO also seeks responses to the following questions: 1. What other improvements could be made to Table 4-D? 2. What might be any benefits/detriments of the proposed changes to Table 4-D noting that the MWh descriptions for small customers relate to business customers, but not residential customers, for whom the corresponding description is "any MWh", across "all" jurisdictions? 3. What is the nature of any	We note that the new definition of Small and Large in the NMI Classification Code is effectively a duplication of the Customer Threshold Code, which makes the Customer Threshold Code redundant. Therefore, we suggest that the Customer Threshold Code be removed.

Section	Description	Participant Comments
	inconsistencies which may exist? 4. What consequential changes are necessary to the Code Information? 5. What, if any, are the unintended consequences of the proposed changes?	

3. MSATS Procedures: WIGS (v4.94)

Section	Description	Participant Comments

4. Metrology Procedure: Part A (v7.31)

Section	Description	Participant Comments

5. Metrology Procedure: Part B (v7.03)

Section	Description	Participant Comments

6. Service Level Procedure Meter Provider Services (v1.5)

Section	Description	Participant Comments

7. NEM RoLR Processes Part A and Part B (v2.1)

Section	Description	Participant Comments

8. Meter Data File Format Specification (v2.2)

Section	Description	Participant Comments
Title page	Effective date	PREPARED BY: AEMO Markets DOCUMENT REF: VERSION: 2.2 EFFECTIVE DATE: 1 October 2022 STATUS: DRAFT The effective date is shown as 2022, which does not align with the 5MS start date. We suggest thtat this be corrected to 1 October 2021.
3.3.1.(b)	Amended to only remove reference to 'N'	(b) Where no Interval values exist, the *IntervalValue* field must contain a value of zero (0) ~~and the QualityFlag field must have a value of "N"~~. A null value is not allowed in the quantity field of the NEM13 file. We note that the purpose of ICF_025 was to remove the ability for a MDP to send 'null' metering data and that the approach AEMO took was to remove the 'N' flag. Therefore, should a MDP wish to communicate metering data that does not exist then they must obtain the actual metering data or substitute the metering data. AEMO has decided to re-instate parts of clause 3.3.1.(b), however this

		conflicts with AEMO's objective for raising ICF_025 because it allows for zero to be populated when interval meter data does not exist. To make matters worse, the 'N' flag is removed but a quality flag is still required for the metering data – this will result in a non-compliant MDFF or an inappropriate quality flag used which will cause confusion. For consistency with the objective of ICF_025 we suggest that the whole of 3.3.1.(b) be deleted.
4.4	UpdateDateTime field	<table><tr><td>*UpdateDateTime*</td><td>DateTime(14)</td><td>M/N</td><td>The latest date/time that any updated *IntervalValue* or *QualityMethod* for the *IntervalDate*. This is the MDP's version date/time that the *metering data* was created or changed. This date and time applies to data in this 300 record. ~~This field is not required if the *QualityMethod* is 'N'.~~</td></tr></table> Given that the last sentence is deleted, we suggest that the field reuqiremnet be changed from 'M/N' to 'M'.

9. Standing Data for MSATS (v4.51)

Section	Description	Participant Comments		
8 Table 7	Amended description of Data Element 'AveragedDailyLoad'	AveragedDailyLoad	The *energy* delivered or generation delivered via ~~through~~ a datastream ~~connection point or metering point~~ over an extended period normalised to a "per day" basis (kWh).	MANDATORY	MDP

Section	Description	Participant Comments
		For consistency with the definition defined in the glossary we suggest that the words '(kWh)' be removed.
Table 8	RegisterID	We agree with AEMO in that the definition of RegisterID should be flexible to cater for scenarios where RegisterID is same as Suffix and RegisterID is not same as Suffix. However, from experience we note that some MDPs provide a RegisterID value that looks like the Suffix but it does not align with the Suffix, for example a RegisterID of E1 and a Suffix of E3. This causes confusion amongst market participant because the wrong value is quoted or it is not clear which field the participant is referring to during enquiries and complaints. We suggest that for market efficiencies, the following be added to the description: If the RegisterID has a value as per the 'Datastream Suffix for Interval Metering Data' section of the NMI Procedure, then it must be the same as the Suffix field in the CATS_REGISTER_IDENTIFIER table.

10. Retail Electricity Market Procedures – Glossary and Framework (v3.41)

Section	Description	Participant Comments

11. Other Issues Related to Consultation Subject Matter

Participant Comments