

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Origin Energy

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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
2.4.(s)	Updated to add text clarifying the relationship mapping	Noted
2.7	Updated to fix the issue with reference link	Noted
2.9.(k)	Updated to fix the issue with grammar	<p>Origin Energy reiterates that it does not support the proposed change to 730 days to cancel/withdraw any incomplete CR 6800’s.</p> <p>As per the feedback provided in the First Stage submission, the issue of CR cancellation prior to install is not a result of a failure in the market structure, but instead of poor planning of work by the MC. The MC is required to provide AEMO with a plan for resolution of the family failures. Appropriate process control to ensure only work expected to be completed within the CR window is raised, is the correct solution. An extension of the CR window also increases the risk of FRMP churn and associated role changes.</p>

Section	Description	Participant Comments
4.4 Table 4-D	<p>Updated to reflect the current jurisdictional requirements and definitions of Small and Large customers. AEMO also seeks responses to the following questions:</p> <ol style="list-style-type: none"> 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 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? 	<ol style="list-style-type: none"> 1. Origin Energy support aligning jurisdictional requirements with Table 4-D however the following issues need to be considered: <ul style="list-style-type: none"> - The use of BUS and RES customer classification codes (CCC) has not been taken into account as it is currently based on consumption threshold. - The NMI classification of SMALL now applies to all RES customers irrespective of threshold. Residential customers can not be a LARGE classification. 2. There are detriments to legitimate RES customers who consume more than the threshold and therefore should have a classification of LARGE. Customers who have a single NMI that is multi purpose (factory where the customer lives upstairs) and above threshold could be moved to RES and will not be assigned a LARGE business tariff. The use of RES / BUS being included in the NMI classification will require an industry wide clean-up of the CCC code prior to implementation. This may result in compliance issues for participants due to inaccurate CCC and hence NMI class confusing tariff application. 3. There will be inconsistencies between CCC and NMI class across the NEM. 4. As per the above. 5. No comment.

Section	Description	Participant Comments
12.6.3	Updated to fix the issue with reference link	Noted

3. MSATS Procedures: WIGS (v4.94)

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

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

Section	Description	Participant Comments
12.5	Reverted wording from 'Validation' to 'Verification' throughout the clause	Origin Energy support the reverted wording from 'Validation' to 'Verification'.
12.6	Amended the wording from 'Validation' to 'Verification' throughout the clause	Origin Energy support the amended wording from 'Validation' to 'Verification'.

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

Section	Description	Participant Comments
9	Amended the wording from 'Validation' to 'Verification' throughout the clause	Origin Energy support the amended wording from 'Validation' to 'Verification'.

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

Section	Description	Participant Comments
4.2	Amended the wording from 'Validation' to 'Verification'	Origin Energy support the amended wording from 'Validated' to 'Verified'.
4.2.(a)(ii)	Amended the wording from 'Validated' to 'Verified'	Origin Energy support the amended wording from 'Validated' to 'Verified'.
4.2.(a)(iii)	Reverted wording from 'Validated' to 'Verified'	Origin Energy support the reverted wording from 'Validated' to 'Verified'.
4.2.(b)	Reverted wording from 'Validated' to 'Verified'	Origin Energy support the reverted wording from 'Validated' to 'Verified'.
4.2.(c)	Amended the wording from 'Validation' to 'Verification' and 'Validated' to 'Verified'	Origin Energy support the amended wording from 'Validated' to 'Verified'.
4.2.(c)(ii)	Reverted wording from 'Validate' to 'Verify'	Origin Energy support the reverted wording from 'Validate' to 'Verify'.
4.2.(d)	Reverted wording from 'Validate' to 'Verify'	Origin Energy support the reverted wording from 'Validate' to 'Verify'.
4.4.(e)	Amended 'New MDP' to 'MDP'	Noted

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

Section	Description	Participant Comments
11.2.(h)(v)	Removed reference to Table 10-B, Table 10-C and Table 10-D	Noted
11.2.(i)	Amended to remove obligation requirement of section 11.2(k)	Noted
11.2.(j)	Amended section reference from 11.2(k) to 11.2(j)	Noted
11.2.(k)	Amended to reflect compliance requirement with section 11.2(i)	Noted
13.3.(k)	Amended to remove reference to section 13.3(m)	Noted
13.3.(l)	Amended section reference from 13.3(l) to 13.3 (k)	Noted
17.2.(c)	Further amendment to replace 'inactivate' with 'deactivate'	Noted

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

Section	Description	Participant Comments
3.3.1.(b)	Amended to only remove reference to 'N'	Noted

9. Standing Data for MSATS (v4.51)

Section	Description	Participant Comments
8 Table 7	Amended description of Data Element 'AveragedDailyLoad'	Noted
9 Table 8	Amended description of Data Element 'Suffix'	Noted

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

Section	Description	Participant Comments
5	Amended definition of 'Validation'	Origin Enerfgy support the amended definition of 'Validation'.
5	Added new definition for 'Verification'	Origin Energy support the added new definition for Verification.
5	Amended definition of 'VICAMI Meter'	Origin Energy support the amended definition of 'VICAMI Meter'.

11. Other Issues Related to Consultation Subject Matter

Participant Comments