RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: PLUS ES*

***Submission Date**: 4th June 2021*

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the Retail Electricity Market Procedures March 2021 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. Service Level Procedure: Metering Data Provider Services (SLP: MDP Services)

Section	Description	Participant Comments
2.4.3 Reactive Energy	Amend the wording to read: (a) Subject to paragraph (b), where the *metering installation* is configured to measure *reactive energy*, the MDP must store this *metering data* with the *metering data* in respect of *active energy* in the *metering data services database*. (b) The *MDP* is not subject to the storage requirement in paragraph (a), if the *metering data* in respect of *reactive energy* as measured by a Type 4 *small customer*, type 5 or VICAMI *metering installation* is not required for the current purposes of either: (i) provision to a requesting party, as may be required for the purposes of additional services under NER 7.4.3; or (ii) application of a *reactive energy*-based network tariff or if required by the FRMP in order to calculate the energy user's bill.	

Section	Description	Participant Comments
New clause 2.4.1(a)(ix)	Insert new clause: Ensure that systems and processes are in place to detect *energy data*, at least every 20 business days, when the datastream is not active for a *metering installation* with *remote acquisition*.	
Renumbered clauses	Clauses renumbered following above change.	
3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data	Insert new clause: (c) Each *MDP* must operate and maintain a process so that on the next *business day* after which a period of, at most, five consecutive *business days* where remote acquisition is unavailable, the *MDP* must notify the *MC* that *remote acquisition* is unavailable.	

3. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)

Section	Description	Participant Comments
12.2 Metering Data Collection	Insert new clauses: (k) When the MC is informed of a metering data collection issue, the MC must:	PLUS ES accepts the objective that clause (k) is seeking to achieve. For further clarification, PLUS ES makes the following recommendations:

Section	Description	Participant Comments
	(i) within 15 business days, take the necessary steps to have the missing metering data collected; (ii) ensure that the metering installations' communications interface is maintained to facilitate ongoing collection of metering data; (iii) ensure that metering data is collected at a frequency that is within the energy data storage capacity of that metering installation such that the metering data collection process prevents the loss of actual metering data; and (iv) ensure that, irrespective of the energy storage capacity of the metering installation, the metering installation reading frequency must not exceed three months since the last actual read was undertaken.	• As section 12.2 is relevant for **metering data collection** in general, PLUS ES suggests the following clarification: (k) When the MC is informed of a **remote acquisition** metering data collection issue, the MC must: • Referencing discussions tabled at the May ERCF, there are large volumes of these metering installations for which the MP encounters access issues (Physical, Customer Refusal etc) and attempts to obtain metering data and/or replace the metering installation are unsuccessful. For this purpose, PLUS ES suggests that clause (k) and its associated subclauses are amended to incorporate these scenarios and align to other clauses of section 12.2, where similar allowances have been made when access to metering installations is a dependency. That is,, (k) When the MC is informed of a **remote acquisition** metering data collection issue, the MC must **use reasonable endeavours to ensure that:** (i) within 15 business days, the necessary steps **are undertaken** to have the missing metering data collected; (ii) ~~ensure that~~ the metering installations' communications interface is maintained to facilitate ongoing collection of metering data; (iii) ~~ensure that~~ metering data is collected at a frequency that is within the energy data storage capacity of that metering installation such that the metering data collection process prevents the loss of actual metering data; and (iv) ~~ensure that,~~ irrespective of the energy storage capacity of the metering installation, the metering installation reading frequency must not exceed three months since the last actual read was undertaken.

4. Guideline for Clarification of the National Measurement Act

Section	Description	Participant Comments
1.1	This is the Guideline for Clarification of the National Measurement Act made under clause ~~7.15~~ 7.16.8 of the NER (**Guideline**). … This version of the Guideline makes reference to those parts of the National Measurement Act that are currently in force. ~~For information, the Guideline also makes reference to aspects of Part IV of the Act, which is expected to come into force in the near future when changes to the National Trade Measurement Regulations are made.~~ Those aspects of the Act that are not currently in force appear in italics in this version of the Guideline.	
3.1; 3.2.1; 3.2.2; 3.3	Minor changes	
3.3	Regulation 5.6 in the National Trade Measurement Regulations 2009 exempts certain classes of electricity meters from ~~Part IV~~ section 4A of the Act. (The exemption was previously located in the National Measurement Regulations);~~ and~~	

5.1.2; 5.2; 5.2.1; 5.2.2; 5.2.4; 5.3	Minor changes	
6.1	*National Trade Measurement Regulations* 2009, Regulation 5.6, "Exempt utility meters": • For the definition of utility meter in subsection 3(1) of the Act, the following classes of meters are exempted from the operation of ~~Part IV~~ section 4A of the Act: (b) electricity meters installed before 1 January 2013; (ba) electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 750 MWh of energy per year;	
6.2; 7; 8.3; Appendix C	Minor changes	

5. MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS)

Section	Description	Participant Comments
9.1.4; 9.2.4; 9.3.4; 9.4.4; 12.2.4;	Removes obligation for LNSP and ENM to populate a Change Request with Connection Configuration.	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field

Section	Description	Participant Comments
12.2.5; 12.3.4; 12.5.4		
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field
10.1.4(d); 10.2.4(d); 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field
10.4.4(d); 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field
15.1.4(d); 15.1.4(f)	Changes position of reference to Connection Configuration for AEMO from 15.1.4(d) to 15.1.4(f).	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field

6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS)

Section	Description	Participant Comments
4.1.4; 4.2.4; 4.3.4; 7.1.4; 7.1.5; 7.2.3; 7.3.4	Removes obligation for LNSP and ENM to populate a Change Request with Connection Configuration.	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field
5.2.4(d); 5.3.4(d); 5.4.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field
9.1.4(b)(i); 9.1.4(b)(iii)	Changes position of reference to Connection Configuration for AEMO from 9.1.4(b)(i) to 9.1.4(b)(iii).	PLUS ES does not support, as per feedback provided with respect to the proposed ConnectionConfiguration field

7. Standing Data for MSATS (Standing Data document)

Section	Description	Participant Comments
Table 6 (CATS_NMI_DATA)	Change location of ConnectionConfiguration field to Meter Register table.	PLUS ES does not support the change of the ConnectionConfiguration field to the Meter Register Table, though we recognise this change was triggered by an ICF which requested the MPB to populate the field. PLUS ES supports that details relating to the Connection point deliver more value at the NMI and should remain at the NMI_Data Table.

Section	Description	Participant Comments
		Please see PLUS ES response in more detail in the field below.

Table 3 (CATS_METER_REGISTER)	ConnectionConfiguration field to be updated as follows:
	
	Two-character code to denote information about the configuration of the connection point.
	
	First Character = Connection Type
	
	H = *High voltage* (as defined in the NER)
	
	L = Low voltage (lower than the threshold defined for *high voltage* in the NER)
	
	Second Character
	A = single phase supply/single phase metering
	B = 2 phase supply/one phase with single phase meter
	C = 2 phase supply/two phases each with single phase metering
	D = 2 phase supply/ two phase metering
	E = 3 phase supply/one phase with single phase metering
	F = 3 phase supply/two phases each with single phase metering
	G = 3 phase supply/two phase metering
	H= 3 phase supply/three phases each with single phase metering
	J = 3 phase supply/three phase metering
		PLUS ES does not support the proposed changes to the ConnectionConfiguration field for the following reasons:
		
		• The proposed configuration whilst well intended would be highly complex. PLUS ES has concerns that the data integrity of the proposed parameters would be compromised mainly due to:
		  ○ Human error factor including interpretation of what is required
		  ○ Participants having to populate a field, visibility of this information not being available and 'pie in the sky' values being used
		• Requiring site visits for a retrospective population of the field may incur a cost burden without any proportional benefits.
		• PLUS ES supports that the information at a **NMI level** delivers more value and could be simplified to reflect the size of the supply to the NMI rather than the premise. This information should be provided by the **LNSP**, as they would have access to these values – not the MPB , i.e greenfield NMIs.
		
		PLUS ES also supports that for the Connection Configuration:
		
		• the Connection Type of the connection configuration would be more beneficial if it contained the following enumerations (see explanation in section 8 of this consultation):
		  ○ **W**C = For a service that is ≤ 100A Low Voltage
		  ○ **L**VCT = For a service that is >100A Low Voltage
		  ○ **H**V = For a High Voltage service

Section	Description	Participant Comments
	K = SWER MANDATORY where there is an installed meter Field to be provided by ~~LNSP~~ MPB	• Second character of this field should reflect the phase supply to the NMI and should be a simple 1,2 or 3 Should the industry want to further define the field as there is no consensus on the value and field during this consultation, then PLUS ES proposes that this field is: • withdrawn or not finalised in this consultation • further work is completed by the ERCF before it is added to another consultation. This would mitigate participants building and populating a field only to undertake further changes in the near future.

8. Questions on proposed changes

Heading	Participant Comments
With regards to ICF_037 Connection Configuration, do you consider that the field would be better split to allow the LNSP to provide the expected supply connection to the site and the MPB to provide the supply at the metering level?	PLUS ES does not consider that the field would be better split to also allow the MPB to provide the supply at the metering level. A Connection Configuration field has different potential uses depending on whether it is a greenfield NMI or an existing NMI, ***as well as*** different meaning at the NMI level and the meter level. Therefore connection configuration at the NMI level should be treated differently to a "connection configuration" (or better labelled as a *metering configuration*) at the meter level At the NMI level When a greenfield NMI is created or alterations works are undertaken to the supply, the size/type of the service is known by the LNSP (but unknown by the MP – that is why it is considered more beneficial). A simple way to characterise the service is as follows: • **W**C: For a service that is ≤ 100A Low Voltage – (always requiring Whole Current metering) • **L**VCT: For a service that is >100A Low Voltage – (always requiring Low Voltage Current Transformer metering) • **H**V: For a High Voltage service (always requiring High Voltage metering with Current Transformers and Voltage Transformers)

Heading	Participant Comments
	If a Connection Configuration at the NMI level is populated by the LNSP at time of NMI creation or when supply alterations are scoped/approved, then it will give value to the market because the above information is the minimum, key differentiating characteristic of the type of metering that is required, allowing the metering requirements to be accurately anticipated prior to “rolling a truck”. Supply at the metering level: PLUS ES metering installations deployment activities are not impacted by not knowing the supply at the metering level. Not knowing the number of phases is not a limiting factor, as installers typically carry a range of meters – but whether the supply size at the NMI is LV and greater or smaller than 100A or HV – is more pertinent to determining the correct deployment activity.