

22 April 2021



Mr Nino Ficca
Interim Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

NEM.Retailprocedureconsultations@aemo.com.au

Dear Mr Ficca

Consultation – Electricity Retail Market Procedures March 2021

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator in response to its Electricity Retail Market Procedures March 2021 consultation.

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited;
- Retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Please find enclosed Energy Queensland's responses to the consultation questions.

Yours sincerely

A handwritten signature in black ink that reads "Trudy Fraser".

Trudy Fraser
Manager Regulation

Telephone: 0467 782 350

Email: trudy.fraser@energyq.com.au

Encl: *Energy Queensland's responses to consultation questions*

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant:

Ergon Energy, Energex, MDYMC, MDYMP, MDYMDP, MDYENM

Submission Date: 22 April 2021

Table of Contents

1. Context	4
2. Service Level Procedure: Metering Data Provider Services (SLP: MDP Services)	4
3. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)	5
4. MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS)	7
5. Standing Data for MSATS (Standing Data document)	8
6. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)	9
7. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS)	11
8. Questions on proposed changes	11

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. Service Level Procedure: Metering Data Provider Services (SLP: MDP Services)

Section	Description	Participant Comments
2.4.3 Reactive Energy	<p>Amend the wording to read:</p> <ul style="list-style-type: none">(a) Subject to paragraph (b), where the <i>metering installation</i> is configured to measure <i>reactive energy</i>, the MDP must store this <i>metering data</i> with the <i>metering data</i> in respect of <i>active energy</i> in the <i>metering data services database</i>.(b) The MDP is not subject to the storage requirement in paragraph (a), if the <i>metering data</i> in respect of <i>reactive energy</i> as measured by a type 4 <i>metering installation</i> is not required for the current purposes of either:<ul style="list-style-type: none">(i) provision to a requesting party, as may be required for the purposes of additional services under NER 7.4.3; or <p>application of a <i>reactive energy</i>-based tariff.</p>	Energy Queensland provides no comment.

Section	Description	Participant Comments
New clause 2.4.1(a)(ix)	Insert new clause: <u>Ensure that systems and processes are in place to detect <i>energy data</i>, at least every 20 business days, when the datastream is not active for a <i>metering installation with remote acquisition</i>.</u>	Energy Queensland provides no comment.
Renumbered clauses	Clauses renumbered following above change.	Energy Queensland provides no comment.
3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data	Insert new clause: <u>(c) Each <i>MDP</i> must operate and maintain a process so that by the fifth consecutive day that <i>remote acquisition</i> is unavailable the <i>MDP</i> notifies the <i>MC</i>.</u>	Energy Queensland provides no comment.

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

Section	Description	Participant Comments
12.2 Metering Data Collection	Insert new clauses: <u>(k) The <i>MC</i> must use reasonable endeavours to identify if a <i>metering installation malfunction</i> exists within 7 days from when</u>	Energy Queensland suggests the proposed 7 day window (from point 12.2 (k)) is unrealistic. We suggest it would be more suitable to align the timeframe to the 15 day window

Section	Description	Participant Comments
	<p><u>an MDP informs them that remote acquisition is not available.</u></p> <p><u>(l) For metering installations that have remote acquisition, the MC must use reasonable endeavours to collect metering data at a frequency that prevents the loss of actual metering data but at a frequency of no more than 14 days since the last actual metering data was collected when remote acquisition is not available.</u></p>	<p>per existing processes for malfunctions which allows time for MSATS updates and an interruption notice to be issued prior to site attendance.</p> <p>For example, participants have 5 days to update MSATS for a status change, and initial checks indicate that a majority of what are initially communications faults are due to network disconnections with no update to MSATS (often taking up to the 5 days or longer).</p> <p>Also, the 7-day window would not allow reasonable time to raise a request and have a retailer or agent issue a service order and an Interruption notice to a customer so that the first field visit can repair/replace the meter.</p> <p>Energy Queensland disagrees with the 14 day cyclic data capture (from point 12.2(l)) as this can create a large impost on the parties – particularly in remote areas. In addition, the current proposed wording does not make any allowance for sites that do have more than 35 days data storage.</p> <p>Energy Queensland proposes the following wording: “For metering installations that have remote acquisition, the MC must use reasonable endeavours to collect metering data at a frequency that prevents the loss of actual metering data.”</p> <p>We also suggest removing the following wording: “...but at a frequency of no more than 14 days since the last</p>

Section	Description	Participant Comments
		<p>actual metering data was collected when remote acquisition is not available.”</p> <p>Energy Queensland notes what appears to be a numbering error in the draft document suggesting the new clause (l) could be a sub clause (a) of clause (k). We suggest a review of this section and confirmation that the two proposed new clauses are independent of one another.</p>

4. 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 12.2.5 12.3.4 12.5.4	Removes obligation for LNSP and ENM to populate a Change Request with Connection Configuration.	Energy Queensland provides no comment.

Section	Description	Participant Comments
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	Energy Queensland provides no comment.
10.1.4(d) 10.2.4(d) 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	Energy Queensland notes what appears to be a numbering error in the draft document and suggests that 10.1.4(d) should be 10.1.4(c).
10.4.4(d) 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	Energy Queensland provides no comment.
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).	Energy Queensland provides no comment.
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	Energy Queensland provides no comment.

5. 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.	Energy Queensland provides no comment.

Section	Description	Participant Comments
Table 3 (CATS_METER_REGISTER)	ConnectionConfiguration field to be updated as follows: MANDATORY where there is an installed meter Field to be provided by LNSP MPB	Energy Queensland provides no comment.

6. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)

Section	Description	Participant Comments
1.1	<p>This is the Guideline for Clarification of the National Measurement Act made under clause 7.15 7.16.8 of the NER (Guideline).</p> <p>...</p> <p>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.</p>	Energy Queensland provides no comment.

3.1 3.2.1 3.2.2 3.3	Minor changes	Energy Queensland provides no comment.
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	Energy Queensland provides no comment.
5.1.2 5.2 5.2.1 5.2.2 5.2.4 5.3	Minor changes	Energy Queensland provides no comment.
6.1	<p><i>National Trade Measurement Regulations 2009, Regulation 5.6, “Exempt utility meters”:</i></p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> (a) electricity meters installed before 1 January 2013; electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 	Energy Queensland provides no comment.

	750 MWh of energy per year;	
6.2 7 8.3 Appendix C	Minor changes	Energy Queensland provides no comment.

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

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	Energy Queensland provides no comment.

8. Questions on proposed changes

Heading	Participant Comments
Do you support the proposals contained in this Issues Paper? If not, please specify areas in which your assessment differs (include ICF reference number), with supporting information.	Energy Queensland generally supports the proposals contained in this Issues Paper, with the exception of those relating to ICF_023. We refer AEMO to the specific concerns and comments detailed in Section 3, Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A) of this response.

Heading	Participant Comments
<p>Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?</p>	<p>Energy Queensland refers AEMO to the specific comments made in this submission as per Section 3, Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A) p.4.</p>
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>Energy Queensland identifies the main challenges in adopting these changes would be availability of resources to develop and implement the required systems and process changes in conjunction with the extensive program of change currently underway or proposed in the NEM.</p> <p>Specifically, compliance to timeframes in the proposed change defined in ICF_023 do not align to the metering capabilities of service providers. For example, 14 days versus 35 days.</p>
<p>With regards to the 'Redefinition of Connection Configuration' proposal (ICF_037), what standing data fields should be presented in the C7 Report, to enhance the report's useability?</p>	<p>In addition to presenting the 'Connection Configuration' in the C7 report, Energy Queensland suggests the report would be further enhanced if some of the CT/VT details where applicable were also presented, specifically the CT/VT ratios.</p>
<p>Do you have any further questions or comments on the proposed changes?</p>	<p>Energy Queensland provides no comment.</p>
<p>Please provide any feedback that closely relates to this consultation on the Procedures but warrants further investigation. AEMO will review any such feedback after this consultation, in the context of another consultation, or the annual prioritisation process.</p>	<p>Energy Queensland provides no comment.</p>

