FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant*:* Evoenergy

Submission Date*:* 18 December 2018

Table of Contents

1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the 'Five-Minute Settlement Metering Procedure Changes – Package 1' consultation.

The changes being proposed are as a result of the Australian Energy Market Commission making a final rule to align operational dispatch and financial settlement at five minutes, starting 1 July 2021.

The Rule change requires the collection, storage and delivery of revenue metering data based on five-minute intervals for use in energy settlement, network and retail billing.

2. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1 (a)(i) & (ii)	Grammatical improvement	Reword sentence so that AS clauses stand out, clearly visible and overall paragraph is easily understood. (i) AS 62052.11, AS 62053.21 and AS 62053.22 for type 1, 2, 3, 4, 4A, and 5 *metering installation measurement elements* (ii) AS 1284.1, AS 62053.21 and AS 62052.11 for type 6 *metering installation measurement elements*
3.1 (e)	Grammatical error	"grandfatherered" change to "grandfathered".
3.4 (f)	Grammatical improvement	[VictoriaNew South WalesQueensland] change 2 times in this paragraph and one is correcvt "12 month" to "12-month"

Section	Description	Participant Comments
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter.	Agree
7	Removal of South Australia requirement (2) Removal of Tasmania requirement (2)	If removing, then need to update [SA](1) as now don't need "Subject to [SA](2)". Do we really need Tasmania, Victoria and ACT jurisdictional differences as a type 5 or 6 meter can no longer replace any meter. Could also drop [Qld](1) for same reason.
9.2	Grammatical error	"thatit" change to "that it".
12.2 (b)	Grammatical error	[South Australia](2) remove double space between "The" and "metering". [South Australia](2) " a a " remove one a. [South Australia](2) Replace "on the basis of" to "based on" [ACT](2) remove double space between "be" and "read"
12.2 (e)	Grammatical error	[Queensland](3) Replace "had an customer" to "had a customer".
12.2 (f)	Change to clause reference	Agree
12.5 (b)	Grammatical improvement	Reword sentence so that AS clauses stand out, clearly visible and overall paragraph is easily understood. Suggested wording

Section	Description	Participant Comments
		To Validate that all metering data stored in the metering data services database is consistent with the energy data stored in the metering installation or the Physical Inventory (as applicable), each MC must ensure that a Sample Test Plan is established and maintained in accordance with Australian Standards; (i) AS 1199: Sampling procedures for inspection by attributes – Sampling schemes indexed by acceptance quality limit (AQL) for lot-by-lot inspection or (ii) AS 2490: Sampling Procedures and Charts for Inspection by Variables for Percent Nonconforming.
12.6 (f)	Grammatical improvement	Is this a question or a statement. New wording to start sentence (f) If the results…
12.8.2 (a)	Grammatical error	Change "SecondTier" to "Second-Tier"
12.8.2 (b)	Change in section reference	Agree
12.8.2 (c)	Grammatical error	remove double space between "calculation" and "of" remove double space between "estimated" and "data" change "load scaling" to "load-scaling"

3. Metrology Procedure: Part B

Section	Description	Participant Comments
Whole of document	Minor grammatical improvement standardisation	There are inconsistencies with spaces after a colon or semi-colon. Some instances have one space, some two.
2.4 Quality Flag [F]	Grammatical improvement	Reword sentence so intended use of F is clearer suggested wording: For Substitutions that are of a permanent or final nature and, subject to section 2.4(b) & (e), Actual Metering Data would not replace the Final *substituted metering data* at any time.
2.5 (b)	Grammatical error	remove double space between "Data" and "and" near end of sentence.
2.6	Update to page references	Agree
3.3.8	Grammatical improvement	Reword sentence so that it is clearer to understand Suggested wording To perform a type 18 Substitution, the MDP may use an alternative method of Substitution subject to agreement with the FRMP, the LR and the LNSP for the connection point. The specifics of this Substitution type may involve; (a) a globally applied method, or (b) a method where an adjusted profile is used to take into account

Section	Description	Participant Comments
		local conditions that affect consumption (e.g. local holiday or End User shutdown), or (c) where alternative metering data may be available for quality checks and minor adjustments of an estimated profile, such as using metering register data.
4.3.3	Grammatical improvement	Reword sentence so that it is clearer to understand, as in 4.2 you must replace S with A when it becomes available. Exclude duplication here Suggested wording To perform a type 53 Substitution, the MDP must re-Substitute *substituted metering data* prior to the date referred to as R2 in the Data Delivery Calendar where the FRMP, the LR and the LNSP have agreed, on the basis of Site or End User information that the original *substituted metering data* is in error and a correction is required. Does not apply where the MDP may now obtain Actual Metering Data.
4.3.7	Grammatical error	remove double space between "MC" and "for" near end of paragraph.
5.2.1 (b) (i)	Grammatical error	remove double space between "Substitution;" and "or" at end of point (i).
5.2.5 (c)	Grammatical error	remove double space between "Datastream;" and "or" at end of point (c).
5.3.6	Grammatical improvement	Reword sentence so that it is clearer to understand, as in 4.2 you must replace S with A when it becomes available. Exclude duplication here

Section	Description	Participant Comments
		Suggested wording To perform a type 66 Substitution, the MDP must re-Substitute *substituted metering data* prior to the date referred to as R2 in the Data Delivery Calendar, where the FRMP, the LR and the LNSP have agreed, on the basis of Site or End User information that the original *substituted metering data* is in error and a correction is required. Does not apply where the MDP may now obtain Actual Metering Data.
10.2	Grammatical improvement	Reword sentence so that it is clearer to read and understand Suggested wording As a minimum, an MDPs *metering data services database*, must undertake the following Validations for metering installation types with *remote acquisition* of *metering data*:
10.2 (b) (ii)	Grammatical improvement	Reword sentence so that it is clearer to read and understand Suggested wording (adding a comma in the same way it is in point (i)) For whole current *metering installations,* the maximum rating of the *meter* is to be used.
10.4	Grammatical improvement	Reword sentence so that it is clearer to read and understand Suggested wording under heading As a minimum, an MDPs *metering data services database*, must undertake the following Validations on *metering data* from manually read interval

Section	Description	Participant Comments
		metering installation with CTs:
10.5	Grammatical improvement	Reword sentence so that it is clearer to read and understand Suggested wording under heading As a minimum, an MDPs *metering data services database*, must undertake the following Validations on *metering data* from whole current manually read interval *metering installations*:
Section 11 and 13	Grammatical error	As part of all the formulas, you have the word "where". For consistency, please make them all the same, so that they are "where:", and not a mishmash of many variations.
11.2.1	Update to section reference to Metrology Procedure: Part A	Agree
11.2.1 (c)(ii)	Grammatical improvement	Sentence is too long Add comma after LR …in MSATS is not the LR, a second…
11.2.2	Update to section reference to Metrology Procedure: Part A	Concur
11.2.3	Update to section reference to Metrology Procedure: Part A	Agree

Section	Description	Participant Comments
11.3.1	Update to section reference to Metrology Procedure: Part A 'Half hourly' reference updated to 'Interval'	Agree
11.3.2	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Okay
11.3.3 (b) (v)	Grammatical improvement Is this sentence still valid with the roll-out of smart meters? Does the LNSP still control the metering site?	Reword sentence so that it is clearer to read and understand Suggested wording (adding commas) The LNSP must ensure that a *meter*, which is a sample Interval Meter installed for the purposes of calculating the CLP, is not removed without the consent of AEMO.
11.4	Update to section reference to Metrology Procedure: Part A 'Half hourly' reference in formulas updated to 'TI' 'Half hourly' reference updated to 'Five minute' Updates made to formulas	Concur
11.4	Grammatical error	When listing the formulas

Section	Description	Participant Comments
11.4	Grammatical error	Wrong word used in sentence, should be as below Y = Five-minute *metering data* <mark>representation</mark> for
11.5	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Agree
11.5(b)(i) & (ii)	Grammatical error	Remove extra space before "or" and "and" at end of each dot point.
11.6	Change end dates from '23:30' to '23:55'	Concur
12	New section added to detail the conversion of interval metering data, previous section 12, and following section numbering, have been changed due to this insertion	Okay
12.3(c)	Grammatical improvement	Reword sentence so that it is clearer to read and understand Suggested wording (adding commas) (c) The energy associated with non-sample Controlled Load metering installations is summe<mark>d for</mark> both First-Tier and Second-Tier Controlled Loads<mark>, a</mark>nd then profiled by applying the controlled load profile (CLP) calculated in accordance with section 11.3.
12.3(d)	Grammatical improvement	Reword sentence so that it is clearer and easy to read and understand (too

Section	Description	Participant Comments
		long) Same wording (adding commas and breaking down to dot points) (d) The five-minute load profile is then determined by; i. subtracting the sum of all non-wholesale metering data (calculated in (b)), and ii. the sum of all Controlled Load five-minute metering data (calculated in (c)) from the Profile Area's wholesale boundary, and iii. embedded generation five-minute metering data (calculated in (a)).
13.1.4	Update to section references	Agree
13.2.2	Update to section reference to Metrology Procedure: Part A	Agree
13.2.4	Update to section references Update to formulas	Agree
13.2.5	Update to formulas	Okay
13.2.6	Update to section references Update to formulas	Okay

Section	Description	Participant Comments
13.3	Update to section references	Agree
13.3.2	Update to section reference to Metrology Procedure: Part A	Agree
13.4	Update to section reference	Agree
13.5.2	Update to section reference to Metrology Procedure: Part A	Agree
13.5.4	Update to section reference Update to formulas	Agree
13.5.5	Update to formulas	Agree
14.1	Update to section reference	Agree
14.3	Update to section reference	Agree

4. Meter Data File Format (MDFF) Specification NEM12 & NEM13

Section	Description	Participant Comments
2(b)	Grammatical error	Remove extra space between "the" and "information".
3.3.3	Included references to five-minute interval	Agree

	metering data	
4.3	NMI data details record (200) - Added '5' to the Interval Length field Definition	Agree
Appendix H	Section added to include five-minute meter data file example	Agree

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
4.4.4	Removal of NEM12 & NEM13 File Clarifications	Agree
5	Addition of various glossary items, including those from the 'Meter Data Provision Procedure'	All okay

6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	Agree
1.2.1	Glossary removed and now included in the Retail Electricity Market Procedures – Glossary and Framework document	Good move
1.2.2	Interpretation section removed from the document	Okay
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	Agree
2.3(d)(i) & (ii)	Grammatical improvement	Reword sentence so that it is clearer to read and understand Suggested wording i.　　Within the timeframes specified in clauses 2.3(b) and 2.3(c), provide all metering data for those retail customers for which all verification information has been supplied. ii.　　Comply with clause 2.1(e) in relation to those retail customers for which not all verification information was supplied.

7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	
• What is your view on the proposed profiling approach for 15 and 30-minute non-controlled load meter reads and why?	Seems reasonable
• What is your view on the proposed profiling approach for 30-minute controlled load meter reads and why?	Appears reasonable
• Are there better profiling options to accommodate 5MS, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?	No comment
Meter Data Delivery to AEMO	
• What are your views on AEMO transitioning to MDFF and why?	AEMO should transition to MDFF for receipt of All metering data. A transition period of 12 months will allow all participants and AEMO opportunity to review validations and make appropriate adjustments to gain efficiencies.
• What are your views on AEMO supporting the	Strongly support so that the MDP can send same structured file to all required participants. This

Heading	Participant Comments
reception of register level meter data and why?	will reduce settlement disputes, NUOS disputes and may improve MDP system performance
• What are your views on MDPs sending the same files to both market participants and AEMO, energy and non-energy, and why?	Will provide AEMO with opportunity to use other data for assessment of system stability.
• What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	As a market participant, with major Rule changes, cost recovery of IT system change for compliance to the new Rules. Participants will have significant IT and process change costs, with no real benefit to an MC, MDP, MPB or network businesses.