

24 June 2019



Australian Energy Market Operator
GPO Box 2008
Melbourne VICTORIA 3001

5ms@aemo.com.au

Dear Sir/Madam

Energy Queensland submission to Five Minute and Global Settlement – Metering Procedure Changes (Package 2) Issues paper

Energy Queensland welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the first stage of consultation for the second package of changes to metering procedures associated with the implementation of Five Minute Settlement and Global Settlement.

Energy Queensland's comments on the proposed changes to metrology documents are provided in the attached participant response template.

Energy Queensland has provided feedback on a large number of the proposed changes. We consider that this may reflect a need for further, more detailed, consultation with stakeholders, particularly retailers, prior to the implementation of Global Settlement. This need for further consultation particularly applies to the proposed changes in relation to Global Settlement for:

- unmetered supply, which are creating concerns for our customers and have the potential to require retailers to operate manual processes; and
- the method to calculate the profile for unaccounted for energy.

In relation to the replacement of meters recording 30 minute data to meters which record five minute data, we note that once installed, the new meter and the retailer's systems will be ready to record and process five minute data. However, delaying effective activation until the following day and requiring the creation of a new profile which lasts only one day for each meter which has changed from 30 minute data to five minute data is likely to create unnecessary manual activity for retailers. We consider that AEMO should reconsider this approach and welcome the opportunity to discuss this with AEMO.

Should AEMO require additional information or wish to discuss any aspect of Energy Queensland's submission, please contact me on (07) 3851 6787 or Peter Wall on (07) 3664 4968.

In the meantime, Energy Queensland will continue to contribute to this discussion via AEMO's Five Minute Settlement working groups.

Yours sincerely



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Enc: Energy Queensland comments on the changes to Metering Procedures

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Energy Queensland

Submission Date: 24 June 2019

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1. Context

This template is being provided 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 2' consultation.

The changes being proposed focuses on supporting the implementation of:

- The Five-Minute Settlement (5MS) Rule
- The Global Settlement (GS) Rule
- Changes to the delivery, format and content contained in the meter data files sent to AEMO.

2. Metrology Procedure: Part A

Section	Description	Participant Comments
12.3, 12.4, 12.7	Provisions for non-contestable unmetered loads	Energy Queensland notes that the separation of NCONUML from Type 7 has been discussed in working groups and questions if this distinction should be reflected in the procedures (throughout section 12).
12.4	Removal of 'First Tier' references	Energy Queensland notes that the references to First-Tier in the jurisdictional material in section 12.8.2 will also require attention.
Additional Comments	<p>Clause 12.2 (e)(3)</p> <p><i>“Notwithstanding (2), an Interval Meter installed where the flow of electricity is greater than or equal to 100 MWh per</i></p>	Energy Queensland considers that this segment does not support GS and the removal of Tier 1 role (assuming this is what is defined as 'negotiated contract').

Section	Description	Participant Comments
	<i>annum and where the connection point has never had a customer with a negotiated retail contract will be read as an Accumulation Meter by the metering data provider. “</i>	

3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2, 2.5, 3.2, 3.3.6, 3.3.8, 4.2, 4.3.3, 4.3.5, 4.3.6, 5.2.1, 5.2.6, 5.3.4, 5.3.6, 6.1, 6.2.4, 14.2.2, 14.3	Provisions for embedded network local retailers (ENLR)	Energy Queensland offers no comments on this change.
6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4, 13.2.1,	Provisions for non-contestable unmetered loads	Energy Queensland notes that section 13.3 indicates that annual energy consumption is determined by AEMO. However, there appears to be contradiction with regards to the party responsible for management of the load tables (AEMO) and the party responsible for calculating energy consumption (the Metering Coordinator).

Section	Description	Participant Comments
13.3.1		Energy Queensland requests AEMO to confirm the process for those uncontrolled devices that operate for less than 24 hours per day.
11.1.2, 11.1.3, 11.2.2, 11.2.3, 11.3.1, 11.3.2, 11.3.3, 11.4, 11.5, 12.3, 12.4	Removal of 'First Tier' and 'Second Tier' references	Energy Queensland offers no comments on this change.
11.2.1	Removal of 'Local Retailer (LR)' references	Energy Queensland offers no comments on this change.
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	Energy Queensland offers no comments on this change.
11.4, 12.3	Provisions for 'bulk supply'	Energy Queensland offers no comments on this change.
12.4	Provisions for UFE (unaccounted for energy)	Energy Queensland offers no comments on this change.

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	Energy Queensland offers no comments on this change.
Additional comment	4.3 NMI Data Details record	Energy Queensland requests AEMO to confirm if interval length should be defined as '05' where mandatory field format = Numeric (2).

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	Energy Queensland offers no comments on this change.
3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	<p>Energy Queensland considers that profiling the NSLP by bulk supply subtraction of NOPROF is unlikely to equate to the aggregation of NMI level estimated NSLP data. Existing methodologies do not appear to be suitable for global settlements with the injection of mass volumes of previously unpublished Type 6 data.</p> <p>Energy Queensland therefore request that AEMO undertake more consultation for settlement load aggregation.</p>
3.2.14, 3.2.16, 9.5, 9.6,	Inclusion of five-minute provisions	Energy Queensland offers no comments on this change.

9.7		
3.2.15, 3.2.16	Provisions for 'bulk supply'	Energy Queensland offers no comments on this change.
3.2.15, 3.2.16, 9.2, 9.3, 9.4, 9.5, 9.6, 9.8, 9.9, 9.10	Provisions for embedded network local retailers (ENLR)	Energy Queensland offers no comments on this change.
3.2.16,	Removal of 'Local Retailer (LR)' references	Energy Queensland considers that Settlement by Difference and the associated role of the LR is still required until the final settlement week revision (R2) in September 2022. If this procedure is effective from December 2020 then it needs to differentiate and cater for dual settlement methodologies <i>throughout the procedure</i> .
6.3, 6.4	Removal of aseXML csv payload tag reference	Energy Queensland considers there is no need to remove the reference to the CSV payload tag, as it will still be used, but instead to change MDM to MTRD.
9.5	Removal of MDM RM14 MDP Data Version Comparison report	Energy Queensland offers no comments on this change.
9.6	Removal of MDM RM15 Multiple Versions report	Energy Queensland offers no comments on this change.
9.9	Removal of MDM RM18 Electricity Interval Data report	Energy Queensland offers no comments on this change.
Appendix	Provisions for FTP and API delivery method	Energy Queensland offers no comments on this change.

A		
Additional comment	6.2 - Update to MDP obligations related to Data Collection Type Code (DCTC)	Energy Queensland considers that this section should change to allow for energy values in units other than kilowatt-hours and the removal of the DCTC code.
Additional comment	9.8	Energy Queensland notes that additional reports and/or modifications to Reconciliation Reports (RM21/27) listed under 9.8 are under discussion with Settlement Focus Groups.

6. MSATS Procedures: MDM File Format and Load Process

Section	Description	Participant Comments
1.1, 2.2, 3.1, 3.3, 3.4, 3.5, 3.7, 3.9, 3.10, 5.2, 5.2.5, 6	Provisions for MDFF (Meter Data File Format)	<p>Energy Queensland is concerned that (based on notes in the HLIA) AEMO appears to be replacing the current MDM database and separating it from MSATS. With such a change, participants will be unable to view metering data in the MSATS browser and run RM reports against this data.</p> <p>Energy Queensland requests AEMO to confirm the architecture and proposed solution.</p> <p>Energy Queensland also questions referencing Gas standards for aseXML.</p>
1.3	Inclusion of additional 'Related Documents'	Energy Queensland offers no comments on this change.
3.6	Changes to table content	Energy Queensland offers no comments on this change.

<p>3.7, 3.8, 3.9, 3.12, 4.4.1</p>	<p>Removal of sections, including references to netting and aggregating to 30-minute</p>	<p>In relation to the proposed change in Section 3.7, Energy Queensland queries why interval data streams are acceptable data type in the MDM transaction given MDM will be for accumulating metering only.</p> <p>Also, in relation to Table 4 (in Data Type row), we question whether this should be updated to indicate that we are delivering validated consumption only.</p> <p>In relation to Section 3.8, we question why netting is listed as applicable for accumulated meter reading data. However, we agree that the meter reading may be a signed reading.</p>
<p>3.8, 5.1</p>	<p>Changes to MDMF content</p>	<p>In relation the the proposed change to Section 3.8 , Energy Queensland queries why netting is listed as applicable for accumulated meter reading data. However, we agree that the meter reading may be a signed reading.</p>
<p>3.11</p>	<p>Inclusion of file size references</p>	<p>Energy Queensland offers no comments on this change.</p>
<p>4</p>	<p>Inclusion of Meter data messaging exchange content</p>	<p>In relation to Sections 4.0, 4.1 and 4.2, Energy Queensland suggests that Step 9-10 is changed to:</p> <p><i>'the MDP recreates a MDMT Data Notification'.</i></p> <p>The MDP would only resend the applicable data not the whole data file.</p>
<p>3.1, 3.3, 3.10, 3.12, 4.2</p>	<p>Provisions for FTP and API delivery method</p>	<p>Section 4.0, 4.1 and 4.2 – Energy Queensland suggests that Step 9-10 is changed to 'the MDP recreates a MDMT Data Notification'. The MDP would only resend the applicable data not the whole data file.</p>

Additional comment	4.3 - Update to MTRD Message Exchange section	Energy Queensland suggests that the reference to 'MDMT' in the first sentence should be replaced with 'MTRD'.
Additional comment	4.4 - Update to MTRD Transaction Acknowledgement Validation Response section	Energy Queensland suggests that Step 8-9 be changed to: <i>'the MDP recreates a MDMT Data Notification'</i> . The MDP would only resend the applicable data not the whole data file.
Additional comment	5.2.3 - Update to section heading for 5.2.4	Energy Queensland considers the heading for 5.2.3 should be 'MTRD Data File Validations'

7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
Quick Reference Guide, 3.4, 3.7, 3.7.2, 4.2	Removal of Change Reason Code 1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003, 4053, 5053, 5090, 5091, 6400, 6401	In relation to CR64xx, Energy Queensland requests confirmation that AEMO will be responsible for fixing incorrect LR assignments through the CR51xx notifications.
Quick Reference Guide, 2.2, 2.6, 3.6, 4.2, 4.3, 4.15, 9.5, 12.8,	Provisions for embedded network local retailers (ENLR)	Energy Queensland notes that the requirement to provide the LR has not been removed from CRs 5001, 5021, 5100 and 5101. Energy Queensland requests AEMO to explain why this is the case.

15.7, 16.7, 17.7, 18.8, 19.8, 20.7, 21.7, 22.7, 23.7, 25.9, 25.10, 27.7, 28.7, 30.7, 31.8, 32.7, 33, 34.7, 35.8, 36.9, 37.1, 37.5, 39.7		
2.9, 3.2, 4.11.2	Removal of 'First Tier' and 'Second Tier' references	Energy Queensland offers no comments on this change.
3.2, 3.4, 4.15, 7.5, 11.4, 11.7, 11.8, 13.4, 13.6, 13.7, 25.9, 26.7, 29.7, 33	Removal of Local Retailer (LR) references	<p>In relation to section 11.4 – Energy Queensland would like AEMO to confirm who populates the LR/ENLR field in MSATS, and with what, if it is no longer provided by the LNSP on the CR2001 transaction?</p> <p>In relation to section 13.4 – Energy Queensland requests AEMO to confirm who is responsible for populating the LR/ENLR field in MSATS, and with what, if it is no longer provided by the LNSP on the CR2501 transaction?</p>
3.7.1, 3.7.2	Changes in table references	Energy Queensland offers no comments on this change.
4.9	Addition to and modification of NMI Classification Codes	Energy Queensland notes that these procedures cover only SMALL and LARGE, and the WIGS procedures have not been updated to cover the new classes. We request confirmation from AEMO as to which CATS transfer procedures cover the new NMI Class codes.

		Energy Queensland also seeks confirmation from AEMO of what date these new classes will become available in MSATS to allow the pre-population of non-contestable unmetered load NMIs.
4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	Energy Queensland notes that there is no Y/N flag against the new entry for NCONUML. In section 4.12.1 (iii) we consider that the definition of the data stream format for COMMS NMIs should be changed so that it includes other alpha prefixes.
4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	Energy Queensland offers no comments on this change.
Various	Updated table and section references throughout the document	Energy Queensland offers no comments on this change.
Additional comment		Energy Queensland questions the reference to mandatory MDM Contributory Suffix use on new metering installations post 1 July 2021.
Additional comment	5 - Removal of RM Reports	Energy Queensland notes the list of available RM reports may also need to be updated to remove RM14, RM15 and RM18 as per the Metrology changes.
Additional comment	25, 39 - Update to LR role for CR5001/CR5021 Maintain NMI – Backdate a NMI – Small or Large as well as CR 5100/CR5101 AEMO Initiated Standing Data Updates	Energy Queensland requests an explanation why the requirement to provide the LR has not been removed from the CRs 5001, 5021, 5100 and 5101.
Additional comment	31.7, 32.6 - Update to Objection rules for CR6200 and CR6300 from LR to ENLR	Energy Queensland considers that the reference to LR in the objection table should be changed to 'ENLR' as per other changes.

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

Section	Description	Participant Comments
Quick Reference Guide, 23	Removal of Chane Reason Code 1050, 1051, 6400 and 6401	Energy Queensland offers no comments on this change.
9.7, 10.7, 11.7, 12.7, 13.7, 14.7, 15.7, 18.7, 20.7, 21.9, 22.7, 23, 25.8, 26.7, 27.1, 28.1, 28.5	Provisions for embedded network local retailers (ENLR)	Energy Queensland seeks confirmation from AEMO as to why certain CR codes have not had LR references or objections removed or changed to ENLR. For example: CR2100, CR2101, CR5110, CR5111, CR5001 and CR5021.
5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7	Removal of Local Retailer (LR) references	Energy Queensland seeks confirmation from AEMO as to why certain CR codes have not had LR references or objections removed or changed to ENLR, for example CR2100, CR2101, CR5110, CR5111, CR5001 and CR5021.
Various	Updated table and section references throughout the document	Energy Queensland offers no comments on this change.

9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	Energy Queensland notes that this statement appears to contradict the changes to the CATS Procedures where the mandatory requirement for the LNSP to populate the LR field in the CR2001 transaction has been removed.
2.2	Provisions for embedded network local retailers (ENLR)	Energy Queensland offers no comments on this change.
2.4, 7	Provisions for non-contestable unmetered loads	Energy Queensland notes that AEMO have recently concluded that this issue is to be resolved by the parties and offers no comment on this change.
7, 9.3	Removal of net data and net datastream references	Energy Queensland offers no comments on this change.
3, 7.2	Provisions for 'bulk supply'	Energy Queensland offers no comments on this change.
7, 9.3	Removal of meter data to AEMO requirements	Energy Queensland offers no comments on this change.

10. NEM RoLR Processes – Part A

Section	Description	Participant Comments
2, 4.3.2,	Removal of Local Retailer (LR) references	Energy Queensland offers no comments on this change.

6.1, 11.3, 12.3		
2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, 103.2, 105.3, Appendix 1	Provisions for embedded network local retailers (ENLR)	Energy Queensland offers no comments on this change.
6.1, 12	Removal of Second Tier references	Energy Queensland offers no comments on this change.
Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	Energy Queensland notes that the references to First and Second Tier have not been removed from Appendix 1 - Specifications for ROLR Reports.
Additional comment	Section 3. Figure 1	Energy Queensland notes that Section 3. Figure 1 is missing the role of MC in the context of open service orders.

11. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	Energy Queensland offers no comments on this change.
2.4.1	Inclusion of 5 February 2022 reference	Energy Queensland notes that in accordance with (xii) B. First Tier load is to be published to MSATS for Global Settlements. As such it is unclear why this is referenced as de-activate as at 5 February

		2022. Energy Queensland requests AEMO to confirm the need to deactivate the datastreams for accumulation meters on 5 February 2022.
3.7.1	References to MDM format and MDMT transaction groups	In relation to (e), Energy Queensland requests confirmation from AEMO why connection point data is aggregated to 30 minute interval net datastream.
3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	Energy Queensland considers that the 3.10.1 (b) iii should be extended to include Load Tables published by the LNSP as changes in Metrology documents for non-contestable unmetered loads indicate the load tables for these would be managed and published by the LNSP, not AEMO.
3.12.4	Provisions for MDPs to deliver AEMO all Datastreams related to settlements ready data and any other metering data configured in the metering installation to support UFE calculations	Energy Queensland offers no comments on this change.
3.12.4	Changes to metering data quantity and quality requirements	Energy Queensland supports the proposed changes to Data Quality to be 100 per cent at R1 for remotely metered sites as this is a current issue with data delivered to the LNSP for DUoS billing.
3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	Energy Queensland offers no comments on this change.
5.1	Changes to meter churn scenario content, including the provision for having to send	In relation to Scenario 4 (v) & (vi) meter churn 30/15 minute to 5 minute (type 1, 2, 3, 4, 4A, or 5 metering installation to a new type 1,

	<p>associated MDFFs to AEMO as well as to participants</p>	<p>2, 3, 4, 4A, or 5 metering installation), Energy Queensland notes that immediately following the commissioning of new metering installation (i.e. on churn day), the installation will be ready for 5 minute trading intervals. We consider that any reads performed prior to commissioning on churn day should be derived (i.e. divided by six for 30 minute or divided by two for 15 minute reads) for the replaced meter.</p> <p>Under the proposed change, retailers would be expected to create a new billing profile for only one day at 30 minutes, and another new billing profile for subsequent days based on 5 minutes for the same new meter. This change would create added complexity and confusion for data provision to customers.</p>
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12. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		<p>Energy Queensland notes that the proposed change appears unnecessarily restrictive and seeks clarification from AEMO why this only applies for meters holding between 30 and 34 days of data .</p>

13. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	Energy Queensland offers no comments on this change.
2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage Requirements	Energy Queensland offers no comments on this change.
2.6.2	Inclusion of bulk supply and/or cross boundary references	Energy Queensland offers no comments on this change.
5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	Energy Queensland considers the use/description of Tier 1 Load/Site and LR in the Glossary could be improved. Further, we suggest inclusion of a definition of non-contestable unmetered load.

14. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Implementing and transitioning to the changes in delivery of metering data to AEMO	
<ul style="list-style-type: none"> Do the proposed changes in the applicable initial draft change-marked procedures implement the required 	Energy Queensland notes that AEMO's use of MDFF rather than net values will assist with settlement processes. However, we are concerned that estimation methods of type 6 meters and NSLP calculations are likely to mask or even contribute to false UFE.

Heading	Participant Comments
changes in section 2.2.5 in an effective manner?	<p>Energy Queensland also notes discrepancies between section 2.2.5 (in the section regarding no changes to B2B delivery for PMDs and VMDs) and the actual changes in the HLIA document version 8.0 (which states MDPs must also send PMD/VMD data to AEMO). There appears to be some contradictions between 2.2.5 and the HLIA document regarding the need to deliver Q and K channels and create data streams for them. Energy Queensland notes that discussions in forums suggested AEMO would accept Q and K channels even if the data streams did not exist in MSATS. We consider that transitional changes will be improved if the new NMI classifications and ability to create non-netted interval data streams are introduced to MSATS prior to 1 July 2021.</p>
<ul style="list-style-type: none"> Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new procedural requirements? 	<p>Energy Queensland notes the need for new versions of metering data be sent to the LR after the implementation of Global Settlement where data supports settlement revisions.</p> <p>Energy Queensland also considers that transitional arrangements need to be extended to data streams and NMI classification types. This will allow MDPs and LNSPs to prepare in advance for 5MS and Global Settlements by updating standing data prior to 1st July 2021 implementation.</p>
<ul style="list-style-type: none"> Is including transitional arrangements in the relevant procedures the most effective way of implementing transitional arrangements? If not, what would be the preferred alternative approach? 	<p>Energy Queensland supports articulating transitional arrangements and 'grandfathering' processes.</p> <p>We also consider that transitional arrangements should be defined separately to avoid the need to amend those procedures once the change is implemented.</p>
Non-contestable Unmetered Loads	

Heading	Participant Comments
<ul style="list-style-type: none"> • How should non-market/contestable unmetered loads be processed and maintained in MSATS? <ul style="list-style-type: none"> ○ Should non-contestable unmetered loads with photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads and why? ○ Should non-contestable unmetered loads which do not have photoelectric (PE) cells be treated differently to those that do? If yes, how should these loads be treated? 	<p>Energy Queensland considers that non-contestable unmetered loads with PE cells could be treated in a similar manner to Type 7 loads. However, those that do not need to be treated differently and should be outside of the scope of the Metrology procedure as 'Other' and are calculated as agreed between the FRMP, LNSP and Customer not through any specific AEMO anticipated methodology.</p> <p>We also note that AEMO could consider the addition of operating hours to either Register or datastream standing data.</p>
<ul style="list-style-type: none"> • What should be considered in creating and assigning non-contestable unmetered NMIs in MSATS e.g. 	<p>Energy Queensland notes that a new Metering Installation code could assist in managing NEM12 processing.</p>

Heading	Participant Comments
<p>introducing a new Metering Installation Type Code (NCONUML) and why?</p>	<p>Energy Queensland also requests that AEMO clarify the type of metering installation that Non-contestable Unmetered Loads be classified in MSATS - ie will they be classed as Type 7? If so, if an MDP is accredited for Type 7 will they therefore be assumed to be accredited for Non-contestable Unmetered Loads, or will there be a separate accreditation process?</p> <p>We also suggest that AEMO consider allowing pre-population of these NMIs in MSATS as it will be a very extensive process for LNSPs.</p>
<ul style="list-style-type: none"> What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why? 	<p>Energy Queensland considers that a defined procedure for NCONUML to cover end users (Telstra/local govt etc) is appropriate. However, this should include details on:.</p> <ul style="list-style-type: none"> How load is calculated, and How to identify/reconcile load where multiple 'devices' are associated to a NMI. <p>Further, Energy Queensland considers it appropriate that every LNSP, MDP and FRMP be allowed to develop their own set of load profiles which are specific to their own set of Non-contestable Unmetered Loads and the load they reflect.</p>
<p>Service Levels for Meter Data Provider Services</p>	
<ul style="list-style-type: none"> Will AEMO's proposed arrangements likely result in more accurate market settlements and why? 	<p>Energy Queensland considers that the addition of Non-contestable Unmetered Loads and the introduction of 5 minute intervals will result in more accurate settlements. However, we note that the majority of the implementation task falls to LNSPs and MDPs while the benefits are likely to accrue to the FRMP.</p> <p>We also note that the activation of datastream for de-energised NMI's may assist with UFE settlement, but seek clarity on the impact on SLA reporting parameters for MDP/DNSP (ie load detected on de-energised NMI).</p>

Heading	Participant Comments
<ul style="list-style-type: none"> What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements? 	<p>Energy Queensland notes that the subtraction of interval data from bulk supply points to determine a NSLP could be masking/contributing to UFE.</p>
<p>Exemption Procedure: Metering Provider Data Storage Requirements</p>	
<ul style="list-style-type: none"> Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process for applying for a data storage exemption and why? 	<p>Energy Queensland believes that the procedure could be improved if it clearly stated the number of days for meter storage rather than referring to the NER.</p>