

# FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

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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	Noted
12.4	Removal of 'First Tier' references	Noted

## 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)	
6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4, 13.2.1, 13.3.1	Provisions for non-contestable unmetered loads	<p data-bbox="1014 619 1912 683">Clauses 13.1.2 (b) &amp; (c) – Require LNSPs to publish a list of non-contestable unmetered loads and the Load Table for non-contestable unmetered loads.</p> <p data-bbox="1014 778 1912 1118">We are aware AEMO is responsible for publishing Load Tables for type 7 devices. The load value is used by all LNSPs to calculate type 7 metering data. AEMO’s initial Load Table originated from the load in the Load Tables published by jurisdictional regulators. As new type 7 load devices were introduced over time, it was AEMO’s responsibility to update the Load Tables based on load and power consumption tests agreed by AEMO, the relevant Registered Participants and end-user. Publication of the Load Table adds value as LNSPs across the NEM use the Load Table to calculate the energy consumption of the devices.</p>

Section	Description	Participant Comments
		<p>It is not clear to us why LNSPs are required <u>to publish the Load Table</u> of non-contestable unmetered loads as it adds no value. Moreover, it is not clear to us who would benefit from the publication of the <u>list of non-contestable unmetered loads by LNSPs</u>. Currently, LNSPs do not publish a list of type 7 loads – so why the need to publish a list of non-contestable unmetered loads.</p> <p>JEN proposes the requirement to ‘publish’ be amended to ‘maintain’ in Clauses 13.1.2 (b) &amp; (c).</p> <p>Clause 13.1.2 (e) is unnecessary because of 13.1.2 (d) points to clause 3.2.2 sub clause (f) “The MC must provide the Inventory Table to relevant Registered Participants when requested.” We suggest subclause Clause 13.1.2 (e) be deleted.</p> <p><b>13.3 Uncontrolled Unmetered Devices</b></p> <p>Section 13.3 was original written for uncontrolled type 7 metering installations and the form of on/off control was 24 hours per day (as per clause 13.3.3). A simple amendment, inserting the words “or non-contestable unmetered load”, appears in the first instance to be a neat solution, but we find clause 13.3.2 (c) [reproduced below ] problematic.</p>

Section	Description	Participant Comments
		<p>“Each MC must develop the initial Inventory Table for the NMIs for which it is responsible. The initial Inventory Table <u>must be agreed with the affected Registered Participants, AEMO and the relevant End User.</u>”</p> <p>We have thousands of non-contestable unmetered devices (security lights, public BBQ’s, NBN cabinets, bus shelters, illuminated signs, cable amplifiers, etc) all of which were initially connected following negotiated agreements on the load/energy consumption between the local retailer, LNSP and the end-user.</p> <p>Noteworthy, the AEMC understanding is the same in its consultation paper “Five minute settlement and global settlement implementation amendments, 13 June 2019”, notes: “...non-market unmetered loads that do not meet the criteria for type 7 metering installation include sports ground lighting, public BBQ’s, NBN cabinets and bus shelters.</p> <p><i>These loads are non-contestable customers that are settled out of the market through a negotiated agreement. The consumption and costs of those loads are agreed between the local retailer, local network service provider and the local council or telecommunications company.”</i></p> <p>We believe it is not practical to renegotiated and seek the requisite agreements from the parties in accordance with clause 13.3.2 (c) to</p>

Section	Description	Participant Comments
		<p>establish the <i>initial</i> Inventory Table. We propose the existing non-contestable unmetered loads as agreed between the local retailer, LNISP and the end-user be used to establish the <u>initial</u> Load Table.</p> <p>We believe the reason the jurisdictions did not classify the myriad of other small unmetered devices as market loads is not to burden LNISPs with costly application of the type 7 metering criteria. We do not believe non-contestable unmetered loads should be subjected to the same criteria of type 7 metering installations, because:</p> <ul style="list-style-type: none"> <li>• the volume of non-contestable unmetered devices are small in comparison to type 7 metering installations,</li> <li>• the type of devices are not commonly deployed in the NEM (such as street lights),</li> <li>• the energy consumption per NMI is miniscule in comparison to the energy consumption per NMI of type 7 installations, and</li> <li>• the cost of applying the type 7 criteria to these non-contestable unmetered devices would outweigh the benefit improving the accuracy of the UFE.</li> </ul> <p>We believe the Load Table for all existing non-contestable unmetered loads be based on the agreed energy consumption values.</p>
<p>11.1.2, 11.1.3, 11.2.2, 11.2.3, 11.3.1,</p>	<p>Removal of 'First Tier' and 'Second Tier' references</p>	<p>Noted</p>

Section	Description	Participant Comments
11.3.2, 11.3.3, 11.4, 11.5, 12.3, 12.4		
11.2.1	Removal of 'Local Retailer (LR)' references	Noted
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	Noted
11.4, 12.3	Provisions for 'bulk supply'	Noted
12.4	Provisions for UFE (unaccounted for energy)	Noted

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	Noted



## 5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	Noted
3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	Noted
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	Noted
3.2.15, 3.2.16	Provisions for 'bulk supply'	Noted
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)	Noted
3.2.16,	Removal of 'Local Retailer (LR)' references	Noted
6.3, 6.4	Removal of aseXML csv payload tag	Noted

	reference	
9.5	Removal of MDM RM14 MDP Data Version Comparison report	Noted
9.6	Removal of MDM RM15 Multiple Versions report	Noted
9.9	Removal of MDM RM18 Electricity Interval Data report	Noted
Appendix A	Provisions for FTP and API delivery method	Noted – Jemena intends to stay with current FTP mechanism

## 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)	Noted
1.3	Inclusion of additional 'Related Documents'	Noted
3.6	Changes to table content	Noted
3.7, 3.8, 3.9, 3.12,	Removal of sections, including references to netting and aggregating to 30-minute	Noted

4.4.1		
3.8, 5.1	Changes to MDMF content	Noted
3.11	Inclusion of file size references	Noted – 10 MB file size for MTRD and MDMT won't be an issue
4	Inclusion of Meter data messaging exchange content	Noted
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	Noted – Jemena intends to stay with current FTP mechanism

## 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	1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003, 4053, 5053, 5090, 5091– Removed as part of Power of Choice program  6400,6401 – Removed as LR entity would not be applicable for 5MS
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)	Noted

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	Noted
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	Noted
3.7.1, 3.7.2	Changes in table references	Noted
4.9	Addition to and modification of NMI Classification Codes	Noted
4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	Noted

4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	Noted
Various	Updated table and section references throughout the document	Noted

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

Section	Description	Participant Comments
Quick Reference Guide, 23	Removal of Chane Reason Code 1050, 1051, 6400 and 6401	Noted
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)	Noted
5.7, 5.8, 7.6, 7.7, 16.9, 16.10,	Removal of Local Retailer (LR) references	Noted

17.7, 19.7, 24.7		
Various	Updated table and section references throughout the document	Noted

## 9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	Noted
2.2	Provisions for embedded network local retailers (ENLR)	Noted
2.4, 7	Provisions for non-contestable unmetered loads	Jemena have NMIs and TNIs already allocated to the unmetered loads – therefore, it is not a significant issue for us
7, 9.3	Removal of net data and net datastream references	Noted
3, 7.2	Provisions for 'bulk supply'	<p><b>7.2. Wholesale and Bulk Supply Connection Points</b></p> <p>(a) A wholesale or bulk supply connection point is a transmission network connection point where:</p> <p>LR = POOL* (where the "*" is a wildcard for the region)</p> <p>(b) For a wholesale or bulk supply connection point a NMI must be assigned to each individual physical or logical metering point that contributes to the wholesale or bulk supply connection point. This requirement is to facilitate a drill down to Datastreams where AEMO is obliged to audit or otherwise investigate energy flows for a wholesale or bulk supply connection point.</p> <p>Why does AEMO reference wholesale keyword? All other procedures have</p>

		replaced wholesale with 'bulk supply' keyword
7, 9.3	Removal of meter data to AEMO requirements	Noted

## 10. NEM RoLR Processes – Part A

Section	Description	Participant Comments
2, 4.3.2, 6.1, 11.3, 12.3	Removal of Local Retailer (LR) references	Noted
2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, Appendix 1	Provisions for embedded network local retailers (ENLR)	Noted
6.1, 12	Removal of Second Tier references	Noted
Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	Noted

## 11. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	Noted
2.4.1	Inclusion of 5 February 2022 reference	Noted
3.7.1	References to MDM format and MDMT transaction groups	Noted
3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	Noted
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	Noted
3.12.4	Changes to metering data quantity and quality requirements	Noted
3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	Noted
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	Noted



## 12. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		Noted

## 13. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	Noted
2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage Requirements	Noted
2.6.2	Inclusion of bulk supply and/or cross boundary references	Noted
5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	Noted

## 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"> <li>Do the proposed changes in the applicable initial draft change-marked procedures implement the required changes in section 2.2.5 in an effective manner?</li> </ul>	
<ul style="list-style-type: none"> <li>Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new procedural requirements?</li> </ul>	
<ul style="list-style-type: none"> <li>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?</li> </ul>	
Non-contestable Unmetered Loads	
<ul style="list-style-type: none"> <li>How should non-market/contestable</li> </ul>	

Heading	Participant Comments
<p>unmetered loads be processed and maintained in MSATS?</p> <ul style="list-style-type: none"> <li>○ Should non-contestable unmetered loads with photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads and why?</li> <li>○ 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?</li> </ul>	<p>JEN supports treatment of non-contestable unmetered loads with PE cells can be treated in similar manner to Type 7 unmetered loads, (for avoidance of doubt, we are referring to security lights)</p> <p>Non contestable unmetered loads without PE cells should be treated differently (i.e. 24 hour loads), because of the difficulties in accurately estimating energy consumption.</p>
<ul style="list-style-type: none"> <li>• What should be considered in creating and assigning non-contestable unmetered NMIs in MSATS e.g. introducing a new Metering Installation Type Code</li> </ul>	<p>Traffic light signals, bus shelters, security lights should have individual codes.</p> <p>All other devices should be assigned a single code</p> <p>In total Jemena is proposing 4 different code types for non-contestable unmetered loads.</p>

Heading	Participant Comments
(NCONUML) and why?	
<ul style="list-style-type: none"> <li>What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why?</li> </ul>	<p>In our view this is AEMO’s responsibility and Jemena does not have a view on this</p>
<p>Service Levels for Meter Data Provider Services</p>	
<ul style="list-style-type: none"> <li>Will AEMO’s proposed arrangements likely result in more accurate market settlements and why?</li> </ul>	<p>Supplying additional data have cost attached to it, however we have no visibility of the overall economic benefit of this change.</p>
<ul style="list-style-type: none"> <li>What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements?</li> </ul>	
<p>Exemption Procedure: Metering Provider Data Storage Requirements</p>	
<ul style="list-style-type: none"> <li>Do you believe that AEMO’s proposed exemption procedure clearly articulates the conditions and process for applying for a data</li> </ul>	

Heading	Participant Comments
storage exemption and why?	