

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: TasNetworks

Submission Date: 21/06/2019

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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	12.3: Agreed 12.4: Agreed 12.7: Agreed
12.4	Removal of 'First Tier' references	12.4: Agreed

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)	Agreed
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>6.1: Agreed</p> <p>11.4: Agreed</p> <p>12.3: Agreed</p> <p>13.1.2: (b) and (c): TasNetworks believes that the LNSP obligation should be to <i>maintain</i> a List and a Load Table, and does not agree that the LNSP needs to <i>publish</i> the List and Load Table. TasNetworks maintains, and will continue to maintain, a List and a Load Table which contains all non-contestable load devices and their respective assessed wattage which is calculated in accordance with local jurisdictional procedures (i.e. LNSP Service & Installation Rules).</p> <p>13.1.3: Agreed</p>

Section	Description	Participant Comments
		<p>13.1.4: Disagree. TasNetworks requests that non-contestable unmetered loads be allocated on the basis of an individual unmetered device per NMI. The reason for this is to facilitate effective management of planned outage notifications as it will be extremely difficult to provide appropriate advice to customers if multiple devices are attached to a single NMI. TasNetworks, upon FRC, registered in MSATS, all non-contestable market loads located in Tasmania on an individual non-contestable device load to single NMI basis, and has continued to do so as additional loads are connected.</p> <p>13.1.5: This clause appears to only apply to market loads and as such the heading should be like 'Load Table for <i>market loads</i>'. TasNetworks suggests that Load Tables for non-contestable unmetered loads of each respective LNSP should contain information that meets the format required for the methodology employed by their respective jurisdictional instrument.</p> <p>13.2.1: Agreed, however suggest that the Device Wattage be determined in accordance with the respective LNSP jurisdictional instrument.</p> <p>13.3.1: Agreed, however suggest that the Device Wattage be determined in accordance with the respective LNSP jurisdictional instrument. TasNetworks typically limit the connection of unmetered non-contestable loads to devices that draw a 'constant load' of less than 1kW, as the assessed consumption (unless agreed otherwise) is derived from the peak load of the installation and applied to each interval in the 24 hour period.</p>

Section	Description	Participant Comments
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	11.1.2: No comment 11.1.3: No comment (NSW) 11.2.2: No comment (QLD) 11.2.3: No comment (SA) 11.3.1: No comment (NSW & QLD) 11.3.2: No comment (SA) 11.3.3: No comment (SA) 11.4: Agreed 11.5: Agreed 12.3: Agreed 12.4: Agreed
11.2.1	Removal of 'Local Retailer (LR)' references	No comment (NSW)
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	11.3.3: No comment 11.4: Agreed

Section	Description	Participant Comments
		12.4: Agreed 13.2.5: Agreed
11.4, 12.3	Provisions for 'bulk supply'	11.4: Agreed 12.3: Agreed
12.4	Provisions for UFE (unaccounted for energy)	Agreed

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

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

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	Agreed
3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	3.2.11: Agreed 3.2.14: Agreed 3.2.15: Agreed 3.2.16: Agreed 9.3: Agreed
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	3.2.14: Agreed 3.2.16: Agreed 9.5: Agreed 9.6: Agreed 9.7: Agreed
3.2.15, 3.2.16	Provisions for 'bulk supply'	3.2.15: Agreed 3.2.16: Agreed
3.2.15, 3.2.16,	Provisions for embedded network local retailers (ENLR)	3.2.15: Agreed

9.2, 9.3, 9.4, 9.5, 9.6, 9.8, 9.9, 9.10		3.2.16: Agreed 9.2: Agreed 9.3: Agreed 9.4: Agreed 9.5: Agreed 9.6: Agreed 9.8: Agreed 9.9: Agreed 9.10: Agreed
3.2.16,	Removal of 'Local Retailer (LR)' references	3.2.16: Agreed
6.3, 6.4	Removal of aseXML csv payload tag reference	6.3: Agreed 6.4: Agreed
9.5	Removal of MDM RM14 MDP Data Version Comparison report	9.5: Agreed
9.6	Removal of MDM RM15 Multiple Versions report	9.6: Agreed
9.9	Removal of MDM RM18 Electricity Interval	9.9: Agreed

	Data report	
Appendix A	Provisions for FTP and API delivery method	App A: Agreed

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>1.1: Agreed</p> <p>2.2: Agreed</p> <p>3.1: Agreed</p> <p>3.3: Agreed</p> <p>3.4: Agreed</p> <p>3.5: Clause 3.5 and information in table 2 should indicate that MDMT Transaction Type can be used for interval meter types for provision of data for reading dates up to and including 30 June 2021.</p> <p>3.7: Clause 3.7 and information in Table 4 should indicate that MDMT Transaction Type can be used for interval data for provision of data for reading dates up to and including 30 June 2021.</p> <p>3.9: Agreed</p>

		<p>3.10: Agreed</p> <p>5.2: In 5.2.3 heading, 'Filer' should be 'File'. 5.2.4 Table 10 should have a separate row for IntervalDate. It is included with IntervalLength.</p> <p>5.2.5: Agreed</p> <p>6: Agreed</p>
1.3	Inclusion of additional 'Related Documents'	1.3: Agreed
3.6	Changes to table content	3.6: Agreed
3.7, 3.8, 3.9, 3.12, 4.4.1	Removal of sections, including references to netting and aggregating to 30-minute	<p>3.7: Agreed</p> <p>3.8: Typographical errors in 3.8.1: 'aDataastream' and 'profiled to into TIs.'</p> <p>3.9: Agreed</p> <p>3.12: No comment</p> <p>4.4.1: Agreed.</p>
3.8, 5.1	Changes to MDMF content	<p>3.8: As per typographical errors noted above.</p> <p>5.1: Agreed</p>
3.11	Inclusion of file size references	3.11: The transaction limit seems excessive. Is this volume expected to create performance issues for participants or AEMO? Can AEMO provide any information based on internal testing?

4	Inclusion of Meter data messaging exchange content	<p>4: References to Figure and Table numbers are not correct.</p> <p>4.3: Reference to Figure 10 should be to Figure 9. Reference to Table 9 should be to Table 8. In the first paragraph of the text under the heading, 'MDMT' should be 'MTRD'. Can AEMO please confirm that MTRD files are able to be loaded via Batch by both the B2M Participant Inbox (as per MDMT files) or alternatively by the B2B Inbox as stated in Table 8 step 1?</p> <p>4.4: Figure numbering/referencing in text is incorrect.</p>
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	<p>3.1: Agreed</p> <p>3.3: Agreed</p> <p>3.10: Agreed</p> <p>3.12: No comment</p> <p>4.2: Agreed</p>

7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
Quick Reference Guide, 3.4, 3.7,	Removal of Change Reason Code 1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003, 4053, 5053, 5090, 5091, 6400, 6401	<p>Quick Reference Guide: Agreed</p> <p>3.4: Agreed</p>

3.7.2, 4.2		<p>3.7: Agreed</p> <p>3.7.2: Agreed</p> <p>4.2: Agreed</p>
<p>Quick Reference Guide, 2.2, 2.6, 3.6, 4.2, 4.3, 4.15, 9.5, 12.8, 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</p>	<p>Provisions for embedded network local retailers (ENLR)</p>	<p>2.2: Agreed</p> <p>2.6: Agreed</p> <p>3.6: Agreed</p> <p>4.2: Agreed</p> <p>4.3: Agreed</p> <p>4.15: Agreed</p> <p>9.5: Agreed</p> <p>12.8: Agreed</p> <p>15.7: Agreed</p> <p>16.7: Agreed</p> <p>17.7: Agreed</p> <p>18.8: Agreed</p> <p>19.8: Agreed</p>

		20.7: Agreed
		21.7: Agreed
		22.7: Agreed
		23.7: Agreed
		25.9: Agreed
		25.10: Agreed
		27.7: Agreed
		28.7: Agreed
		30.7: Agreed
		31.8: Agreed
		32.7: Agreed
		33: Agreed
		34.7: Agreed
		35.8: Agreed
		36.9: Agreed
		37.1: Agreed

		<p>37.5: Agreed</p> <p>39.7 Agreed</p> <p>Section 9.8, tables 9-B and 9-C should have 'LR' changed to 'ENLR'.</p> <p>Section 12, 'LR' in table 12-B should change to 'ENLR'.</p> <p>Section 14, 'LR' in tables 14-B and 14-C should change to 'ENLR'.</p>
2.9, 3.2, 4.11.2	Removal of 'First Tier' and 'Second Tier' references	<p>2.9: Agreed</p> <p>3.2: Agreed</p> <p>3.3(b) has an invalid section reference.</p> <p>4.11.2: Agreed.</p>
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>3.2: Agreed</p> <p>3.4: Agreed</p> <p>4.15: Agreed</p> <p>7.5: Agreed</p> <p>11.4: Agreed</p> <p>11.7: Agreed</p> <p>11.8: Agreed</p>

		<p>13.4: Agreed</p> <p>13.6: Agreed</p> <p>13.7: Agreed</p> <p>25.9: Agreed</p> <p>26.7: Agreed</p> <p>29.7: Agreed</p> <p>33: Agree</p> <p>Are AEMO considering to configure MSATS to reject Change Requests if incorrect LR role is allocated (e.g. CR2001 is created for distribution NMI with existing LR participant ID instead of GLOPOOL)?</p> <p>With reference to section 25.4(c) and (e), similar to section 11.4(c) and (e), should the LR role be optional on a CR5001?</p>
3.7.1, 3.7.2	Changes in table references	<p>3.7.1: Agreed</p> <p>3.7.2: Agreed</p>
4.9	Addition to and modification of NMI Classification Codes	<p>For DHYBRID and THYBRID, what is the definition of ‘Significant bi-directional energy flows’? There may need to be a classification guideline developed (or additional information included in CATS Procedure) to guide classification of such NMI’s. May also be worthwhile to include a footnote that NMI’s with these codes will be regarded as a generating unit (i.e.</p>

		<p>Aggregate = N).</p> <p>Participants currently use SMALL and LARGE classifications to guide business processes and obligations. If NMIs can now be classified as DHYBRID or THYBRID (or SGA), participants may lose visibility of obligations required, particularly for small customers (i.e. NERR obligations). Has consideration been given to the impact of managing NMI's with these classifications in accordance with respective terms in the NERR?</p> <p>BULK, DHYBRID, THYBRID, SGA, DGENRATR and NCONUML classifications are not catered for in the MSATS CATS Change Request conditions (i.e. the 'conditions precedent' for change requests in CATS only relate to SMALL or LARGE NMIs).</p> <p>What is the reasoning behind creating the new DHYBRID and THYBRID classifications? Could these (and SGA) connections simply be classified as generating units?</p> <p>Are AEMO considering to configure MSATS to reject a Change of Retailer CR for a NCONUML NMI? If so, will a new rejection code be introduced? TasNetworks currently maintain an internal list of such NMI's and create an objection upon receipt of a CR1XXX request.</p>
4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	4.12: Agreed
4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	4.11.2: Agreed 4.17: Agreed

Various	Updated table and section references throughout the document	For consistency with naming convention, Tables 411-A, 411-B and 411-D should be labelled as 41-A, 41-B, 41-D. Should the 'LR' column in tables 41D, E, F, G, H, and I be labelled 'ENLR'.
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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 Change Reason Code 1050, 1051, 6400 and 6401	Agreed
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)	6.8: Agreed 9.7: Agreed 10.7: Agreed 11.7: Agreed 12.7: Agreed 13.7: Agreed 14.7: Agreed 15.7: Agreed

		<p>18.7: Agreed</p> <p>20.7: Agreed</p> <p>21.9: Agreed</p> <p>22.7: Agreed</p> <p>23: Agreed</p> <p>25.8: Agreed</p> <p>26.7: Agreed</p> <p>27.1: Agreed</p> <p>28.1: Agreed</p> <p>28.5: Agreed</p>
<p>5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7</p>	<p>Removal of Local Retailer (LR) references</p>	<p>5.7: Agreed</p> <p>5.8: Agreed</p> <p>7.6: Agreed</p> <p>7.7: Agreed</p> <p>16.9: Agreed. In Table 16-B (CR5021) change LR to ENLR.</p> <p>16.10: Agreed. In Table 16-C change LR to ENLR.</p>

		17.7: Agreed 19.7: Agreed 24.7: Agreed
Various	Updated table and section references throughout the document	Section 3.2 (a) has a broken section cross reference.

9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	2.2(d): Agreed, however the CATS Procedures now has the LR role as optional on a Create NMI CR, therefore this should be reflected in the wording of this obligation. Possibly add 'if provided' to the end of the sentence?
2.2	Provisions for embedded network local retailers (ENLR)	2.2(e): Agreed
2.3.1	Additional item from TasNetworks – populating LR for Type 7 installations	Clause 2.3.1 should also include a requirement for population of LR role to be populated with 'GLOPOOL' if provided.
2.4, 7	Provisions for non-contestable unmetered loads	2.4: Should also include a requirement that the LR field must be populated with 'GLOPOOL' if provided. TasNetworks opposes the grouping of multiple unmetered device loads

		<p>onto a unique NMI, as planned interruption notifications will not be able to be achieved without significant change to impacted systems and processes. The current approach that TasNetworks has adopted since FRC is to allocate a single non-contestable unmetered device load to a single NMI. TasNetworks requests AEMO to consider NMI allocation on the basis of a single non-contestable unmetered load to a single NMI.</p> <p>7: Agreed</p>
7, 9.3	Removal of net data and net datastream references	<p>7: Agreed</p> <p>9.3: Agreed</p>
3, 7.2	Provisions for 'bulk supply'	<p>3(g): Agreed</p> <p>7.2(a): Agreed</p> <p>7.2(b): Agreed</p>
3(a)(iii)	Additional item from TasNetworks – “W” for wholesale NMI's	It is expected that existing wholesale NMIs that are transferred to BULK NMI classification will remain with “W” as the fifth character. Will “W” continue to be used in allocation of new BULK NMI's?
7, 9.3	Removal of meter data to AEMO requirements	<p>7: Agreed</p> <p>9.3: Agreed</p>

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	2: Agreed 4.3.2: Agreed 6.1: Agreed, except 6.1(d) refers to section 13 which has now been deleted in the following sub clause. 11.3(b): Agreed 12.3: Agreed
2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, Appendix 1	Provisions for embedded network local retailers (ENLR)	2: Agreed 3: Fig 2 and Fig 3 still have references to LR and Tier 2. 6.1: Agreed 7.1: Agreed 11.2: Agreed 12: Agreed 13: Agreed 15.1: Agreed 18.2: Table 18-A refers to CR6401 which has been removed from CATS. Appendix 1: Agreed

6.1, 12	Removal of Second Tier references	6.1: Agreed 12: Agreed 12.2(d) refers to CR6401 that have been removed from CATS procedure.
Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	Agreed

11. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	1.3: Agreed
2.4.1	Inclusion of 5 February 2022 reference	2.4.1(a)(xi): Agreed 2.4.1(a)(xii)B: Suggest changing wording to 'up to and including 5 February 2022', or similar, rather than 'as at 5 February 2022'.
3.7.1	References to MDM format and MDMT transaction groups	3.7.1(e): Agreed
3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	3.10: Agreed 3.11: Agreed 3.12.2(f): Agreed

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	3.12.4(a): Agreed 3.12.4(b): Agreed, space missing between 'calculations' and 'applicable' in second line.
3.12.4	Changes to metering data quantity and quality requirements	3.12.4 (table): Agreed
3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	3.12.5: Agreed 3.14.1: Agreed 3.14.2: Agreed
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	5.1: Agreed

12. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		Section 2.5(a)(i) is missing a space between 'final' and 'reconfiguration'. TasNetworks has no other comment on this procedure document.

13. Retail Electricity Market Glossary and Framework

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

14. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Implementing and transitioning to the changes in delivery of metering data to AEMO	With reference to the document FIVE MINUTE & GLOBAL SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2) ISSUES PAPER
<ul style="list-style-type: none"> Do the proposed changes in the applicable initial draft change-marked procedures 	In general, the marked changes reflect the required changes. However it is difficult to identify the changes given the multiple versions being reviewed.

Heading	Participant Comments
<p>implement the required changes in section 2.2.5 in an effective manner?</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>Having a transitional window is useful for participants readiness activities. However, more decisions are needed to be understood. For example, the creation of current Tier 1 type 6 datastreams, creation of register level interval datastreams, transition 'N' data streams etc. This may become clearer as we work through the transitional and readiness activities.</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>Transitional arrangements need to be included in procedures, but need to be complemented with a transition plan that shows all transitional activities that will be documented by the RWG. The transition plan may need to be specific by type of participant because requirements will be different according to role – retailer, DNSP, MDP will have different requirements.</p>
<p>Non-contestable Unmetered Loads</p>	
<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 	<p>As noted in our feedback above, TasNetworks recommends that non-contestable unmetered loads be maintained on a single NMI to single unmetered device load basis. We further recommend that assessed loads for these devices be calculated on a methodology agreed between the DNSP, retailer and customer and in accordance with local jurisdictional instruments without having to publish a load table for each device.</p> <p>Non-contestable unmetered loads with PE cells should be treated similarly to Type 7 unmetered</p>

Heading	Participant Comments
<p>photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads and why?</p> <ul style="list-style-type: none"> ○ 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>loads, as the on-off times for these devices will be similar to those provided in the on-off tables.</p> <p>Yes, non-contestable unmetered loads without PE cells are deemed to have continuous 24 hour supply, therefore TasNetworks deems their load profile to be flat for every integration period during a 24 hour period.</p>
<ul style="list-style-type: none"> • What should be considered in creating and assigning non-contestable unmetered NMIs in MSATS e.g. introducing a new Metering Installation Type Code (NCONUML) and why? 	<p>Ability to provide advice on planned outage notifications, hence the need for single NMI allocation per device load.</p> <p>TasNetworks currently maintains its own list of non-contestable NMIs (i.e. NMIs we have currently allocated which will be referred to as non-contestable unmetered loads). Therefore TasNetworks does not deem it necessary to create a new NMI classification code or Metering Installation Type Code (NCONUML) as we have capability to continue to maintain our own exclusion list and our system is configured to object should a change of retailer request be received on one of these NMIs.</p> <p>Consideration may also need to be given to the impact on the B2B Service Order Process and</p>

Heading	Participant Comments
	participants systems and processes, as MeterInstallCode is an allowable field in this procedure.
<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? 	As per our jurisdictional instrument (DNSP service and installation rules) TasNetworks assesses an uncontrolled unmetered non-contestable load as the peak load measured by the connection point and is deemed to be in operation for each interval over a 24 hour period. If the customer believes that this is not appropriate they can arrange for a metered connection point or, by agreement with TasNetworks, provide a NATA accredited report of the deemed load for the device.
Service Levels for Meter Data Provider Services	
<ul style="list-style-type: none"> Will AEMO's proposed arrangements likely result in more accurate market settlements and why? 	No comment.
<ul style="list-style-type: none"> What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements? 	No comment.
Exemption Procedure: Metering Provider Data Storage Requirements	
<ul style="list-style-type: none"> Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process 	The procedure seems adequate to meet the requirement.

Heading	Participant Comments
for applying for a data storage exemption and why?	