

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Origin Energy

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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. MSATS Procedures: CATS

Section	Description	Participant Comments
2.1.(l)	New section added to clarify the communication of the identification of incorrect NMI	<p><u>Clarification required:</u></p> <p>What does AEMO define as promptly?</p> <p>As the clause is generic the notification method to advise other participants of incorrect standing data information is not defined. Is it assumed that it is up to the participants involved to work out the best method of communication i.e. transaction, email etc?</p> <p>In terms of incorrect standing data information what defines this i.e. does an unstructured address mean the standing data is incorrect?</p>
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	Agree
2.4.(d)	Updated to define timeframes for updating	Agree

Section	Description	Participant Comments
	datastreams in MSATS	
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	Agree
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	<p><u>Clarification required:</u></p> <p>If you need to update the datastream within 2 businss days of becoming MDP – is this after the 300X is issued. There would be value in seeing a mapped out step of 300X then 400X and the timeframes. If there is a longer timeframe to update MSATS – such as issuing 1500 how does this align?</p>
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	<p>Origin request AEMO to provide an example of this proposal. The understanding is that MSATS would show the end date of the active record to be the actual date of the de-energisation. Then the start date of the de-energisation + 1 e.g.</p> <p>05/06/19 De-en remotely occurred on this date.</p> <p>MSATS would show end date of active record as of 05/06/19.</p> <p>MSATS would show start date of de-en record as of 06/06/19.</p> <p>If De-en occurs at 1pm on 05/06/19, expect actual reads expected from midnight to 1pm, then remainder of day to be zero temporary substitutions.</p>

Section	Description	Participant Comments
		And should then they sub zeros from the point of de-en upto midnight on that day?
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	<p>Should the MPB sub zeros up to the re-en point from midnight?</p> <p>Eg. 05/06/19 : Re-en remotely occurred on this date.</p> <p>MSATS would show end date of de-en record as of 04/06/19.</p> <p>MSATS would show start date of re-en record as of 05/06/19.</p> <p>If Re-en occurs at 1pm on 05/06/19, expect substituted reads from midnight to to 1pm, then remainder of day to be actual reads.</p>
4.18	Updated to clarify the LNSP’s obligations in relation to creating Embedded Network Codes and ENM’s obligations in relation to application of the Embedded Network Code and data provided to AEMO upon appointment.	<p>Agree</p> <p>Can we include the timeframe AEMO has to publish the embedded network code?</p>

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	

4. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1.(a)	Update to remove the word 'relevant'	
3.1.(b)	Update to remove the word 'relevant'; add requirements of AS60044.3 or IEC61869.1 and IEC61869.2; and detail what each topic the part of the standard covers	
3.1.(c)	Update to remove the word 'relevant'; add requirements of IEC61869.1 and IEC61869.3; and detail what each topic the part of the standard covers	
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	
12.5.(a)	Removal of obsolete standard AS2490	
12.5.(b)	New section added to detail Sample Test Plan settings	
12.5.(c)	New section added to specify when a test sample is deemed to have passes the verification test	
12.5.(d)	New section added to specify when the steps to be followed after each round of	Origin's view is that it should be included in the Metrology Procedure Part A, that the MP must verify all Metering Installations belonging to the failed

Section	Description	Participant Comments
	verification	<p>sample/family/type of meters. As the meters belong to the Meter Providers they should be verifying and rectifying their assets.</p> <p>Whilst the MC needs to ensure that the metering installations are verified, we request that an additional clause be added in under (d)(iii) as (e) to avoid the ambiguity around who will verify and resolve the metering non-conformities with the rule.</p> <p>Further suggestion that the MP must be required to provide the MC with an updated test plan tailored on how they address the identified Family Failures.</p>
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	What is considered validated meter readings? Origin suggests this should be undertaken between actual quality reads.
5.3.9	Addition of substitution type 69: Linear Interpolation	What is considered validated meter readings? Origin suggests this should be undertaken between actual quality reads.

6. Service Level Procedure Meter Data Provider Services

Section	Description	Participant Comments
2.4.1.(ix)	New section added to define an obligation to activate datastreams when energy is recorded from a metering installation while the NMI status is not Active	<p><u>Clarification required:</u></p> <p>How will the MDP determine/identify that energy is being recorded on the NMI?</p>
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	<p><u>Suggested update to working of this section:</u></p> <p><i>Deliver validated metering data to all Participants with responsibilities for that NMI when Datastreams are active in MSATS, regardless of the NMI Status.</i></p> <p>If a NMI is de-energised and consumption is being recorded, this falls into an unauthorised usage.</p>
4.2.(g)	Amend outdated rule reference	
6.4.1.(c)	Amend outdated rule reference	
7.3.(b)	Amend outdated rule reference	

7. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2.(a)(iii)	Amend outdated rule reference	
5.2.(a)	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	

8. Service Level Procedure Embedded Network Manager

Section	Description	Participant Comments
2.1.2.(d)	New section added to define an obligation that the EN for which the ENM has been appointed has an exemption by the AER.	Origin support the addition of this new section.
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	Origin support this update.
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	

Section	Description	Participant Comments
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	Origin suggest updated to working of this clause by adding in 'controller'. <i>liaise with the embedded network owner/controller to ensure that the Network Tariff Code created populated by the MPB when the meter was recorded in MSATS for a child connection point</i>

9. Exemption Procedure Meter Installation Malfunctions

Section	Description	Participant Comments
1.1.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
Appendix B	Updated to incorporate additional clause reference for timeframes for metering	

Section	Description	Participant Comments
	installation malfunction identification and rectification.	

10. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Are there better options to accommodate the change proposals, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?	
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	