

# METERING ICF PACKAGE CHANGES

## PROCEDURE CONSULTATION

### FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Red Energy and Lumo Energy

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## 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.

## MSATS Procedures: CATS

The highlighted columns are additional feedback to amendments not included in below table.

Section	Description	Participant Comments
2.1(h)	The proposed amendments to clarify the intent of the obligation.	Red Energy and Lumo Energy (Red and Lumo) support the amendment of this clause however, propose the following wording be considered;  (h) Participants must ensure that CATS Standing Data is kept current and relevant for the on all NMI for in which they are responsible.
2.1(i)	Amendments to timeframes for NMI Standing Data updates	We are supportive of changes and amendments to timeframes specified within this clause however have provided suggested grammatical amendments as follows:  (i) Unless a different timeframe is specified in these Procedures, a Participant must update the CATS Standing Data, for all NMIs in which they are responsible for <del>which it responsible</del> within <del>20</del> 10 business days of;  (i) being advised by a Participant that the CATS Standing Data <del>it</del> is no longer current or relevant or;

		(ii) becoming aware that the CATS Standing Data <del>it</del> is no longer current or relevant.
2.1.(l)	New section added to clarify the communication of the identification of incorrect NMI	Red and Lumo support the purpose of changes to this obligation however, have provided suggested amendments to ensure define terms are italicised;  (l) When a Participant becomes aware that CATS Standing Data related to a <i>NMI</i> is incorrect, that Participant must promptly notify other impacted Participants. <del>and</del> The Participants must cooperate with each other to facilitate the correction of the CATS Standing Data.
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	Red and Lumo support the changes to this clauses however, have provided suggested minor amendments to the way in which the clause reads;  (c) Where an MDP is to update an Interval Datastream Status Code to 'I' (Inactive) for a <i>connection point</i> that is de-energised; the MDP must;  (i) ensure the Proposed Change Date <del>must be</del> is the day after the <i>connection point</i> is de-energised, <del>and</del> ;  (ii) ensure Interval Datastream Status Code <del>be</del> is updated in MSATS within two business days of the <i>connection point</i> being de-energised.  (The Datastream Status Code is the key criterion used to include metering data in the settlement process).
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	Refer to feedback on item 2.4(c).
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	Refer to feedback on item 2.4(c).

2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	<p>Red and Lumo support the inclusion of this obligation within the CATS procedures however, have provided suggested minor amendments to the way in which this clause reads;</p> <p>(f) Create or update the datastream within two <i>business days</i> from the time the meter is either installed<del>/</del>, removed<del>/</del>, reconfigured or as required when the MDP becomes the Current MDP.</p>
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	Red and Lumo support the proposed amendments to this clause.
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	<p>While acknowledging the process for updating the status overnight due to the market request. Red and Lumo believe that there is benefit in changing this requirement to the date the connection point is de energised which will align with 2.5 (b) and the date of de-energisation.</p> <p>We have also provided minor amendments to the way in which this clause reads and consistent with how similar clauses in procedures are written;</p> <p>Where an MPB is to update an Interval Meter Register Status Code <del>A</del>an MPB must:</p> <p>(a) <del>Where an MPB is to update an Interval Meter Register Status Code</del> Update the Interval Meter Register Status Code to 'D' (De-energised) for a connection point that is remotely de-energised, the Proposed Change Date must be the day after the connection point is de-energised.</p> <p>(b) <del>Where an MPB is to update an</del> Update the Interval Meter Register Status Code for Interval Meter to 'A' (Active) for a connection point that is remotely re-energised, the Proposed Change Date must be the day the connection point is re-energised.</p>

2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	Refer to feedback on item 2.5(a)
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.	Red and Lumo support the inclusion of this obligation within the CATS procedures and offer no further comment at this stage.

## MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	Red and Lumo support the minor updates to version numbering.

## Metrology Procedure: Part A

Section	Description	Participant Comments
3.1.(a)	Update to remove the word 'relevant'	Red and Lumo support and have no further comment
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	Red and Lumo support the changes proposed however as previously advised the national measurement institute (NMI) is currently reviewing "the standards" and will likely impact the procedures. Has this been considered in the consultation by AEMO?
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	Red and Lumo support the changes proposed however as previously advised the national measurement institute (NMI) is currently reviewing "the standards" and will likely impact the procedures. Has this been considered in the consultation by AEMO?
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	Red and Lumo support the changes proposed however as previously advised the national measurement institute (NMI) is currently reviewing "the standards" and will likely impact the procedures. Has this been considered in the consultation by AEMO?
12.5.(a)	Removal of obsolete standard AS2490	Red and Lumo support the changes proposed however as previously advised the national measurement institute (NMI) is currently reviewing "the standards" and will likely impact the procedures. Has this been considered in the consultation by AEMO?
12.5.(b)	New section added to detail Sample Test Plan settings	Proposed amendments;  (a) Each MC must ensure that a Sample Test Plan is established and maintained in accordance with Australian Standards "AS 1199: Sampling procedures for inspection by attributes –Sampling schemes indexed by acceptance quality limit (AQL) for lot-by-lot inspection" 

		<p><del>“AS 2490: Sampling Procedures and Charts for Inspection by Variables for Percent Nonconforming”</del> 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).</p> <p>Any reference throughout this clause needs to be consistent in wording , the use of “test sample” and “Sample Test Plan” are used consistently throughout this section.</p> <p><i>(c) A <del>test</del> Sample Test Plan sample is deemed to have passed the verification test when the metering data stored in the metering data services database is consistent with the energy data stored in the metering installation. If these do not match, then the test sample is deemed to have failed the verification test and must be rectified.</i></p>
	New section added to specify when a test sample is deemed to have passes the verification test	Refer to feedback to item 12.5(b).
	New section added to specify when the steps to be followed after each round of verification	Refer to feedback to item 12.5(b).
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	Red and Lumo support the proposed amendments at this stage and have no further comment.

## Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	Red and Lumo support the proposed amendments at this stage and have no further comment.
5.3.9	Addition of substitution type 69: Linear Interpolation	Red and Lumo support the proposed amendments at this stage and have no further comment.

## 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>Red and Lumo support the proposed amendments however, have provided suggested amendments to the wording of this clause;</p> <p>(ix) ensure <i>metering activate</i>-Datastreams are updated <del>in MSATS</del> in accordance with clause 2.4(e) MSATS procedures when the MDP becomes aware that energy is being recorded from a metering installation, and deliver validated metering data to AEMO regardless of the NMI status;</p>
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	Red and Lumo support the proposed amendments at this stage and have no further comment.
4.2.(g)	Amend outdated rule reference	Red and Lumo support the proposed amendments at this stage and have no further comment.
6.4.1.(c)	Amend outdated rule reference	<p>Red and Lumo would like to confirm the objective AEMO is trying to achieve by amending the Rule reference to a specific sub clause?</p> <p>The current wording in the procedures is in relation to not only the restriction of registered participants to access relevant CATS standing data and MSATS reports but also relates directly to access to metering data. We propose that AEMO amend this rule reference to extend to the entire</p>

		<p>section of the rule 7.15.5 (Access to data) as the current proposed rule referenced in the procedure is not accurate.</p> <p>Example: NERR 7.15.5(d),(e) and (f)and reference in NER 7.10.2(a)(3)</p>
7.3.(b)	Amend outdated rule reference	<p>Red and Lumo suggest that the rule reference be extended to both NER 7.10.2(e) and 7.11.3(e), as both clearly outline obligations when changes are made to metering installation and should be referenced together.</p> <p><i>(b) Where an MDP becomes aware that incorrect metering data has been delivered to AEMOand Registered Participants, the MDP must provide corrected metering data to all affected parties, as required by clause 7.10.2(e) and 7.11.3 (c) of the NER, within one business day of detection.</i></p>

## Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2.(a)(iii)	Amend outdated rule reference	Please confirm the amended reference was in fact to the Metrology Procedures: Part A not a rule. The description of changes suggest this was an outdated rule reference.

5.2.(a)	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Red and Lumo support the amendment and inclusion of rule references within this clause.
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## 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.	Red and Lumo support the proposed amendments at this stage and have no further comment.
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	Red and Lumo support the proposed amendments at this stage and have no further comment.
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	Red and Lumo support the proposed amendments at this stage and have no further comment.
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	Red and Lumo do not believe that this proposed change is necessary in light of the existing obligation.

## Exemption Procedure Meter Installation Malfunctions

Section	Description	Participant Comments
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1.1.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Red and Lumo support the amendment and inclusion of rule references within this clause.
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Red and Lumo support the amendment and inclusion of rule references within this clause.
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Red and Lumo support the amendment and inclusion of rule references within this clause.
Appendix B	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Red and Lumo support the amendment and inclusion of rule references within this clause.

## Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
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<b>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?</b>	Red and Lumo support the proposed amendments to the procedures at this stage and have no further comment.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	