METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Endeavour 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
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3. MSATS Procedures: WIGS

Section	Description	Participant Comments
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4. Metrology Procedure: Part A

Section [Description	Participant Comments
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5. Metrology Procedure: Part B

Section	Description	Participant Comments
5.3.9	Addition of substitution type 69: Linear Interpolation	 The wording of clause 5.3.9 only allows the metering data to be recalculated between Actual Meter Readings. We believe that this would have adverse impacts given that there are customers who do not have an Actual Meter Reading for over 9 months and adjusting reads that are over 9 months old may not be rebilled due to regulatory restrictions. This could place retailers and networks at a financial disadvantage or cause extra rebilling work for little benefit. We suggest that the MDP be allowed to use type 69 between two validated reads, with these validated reads being either a substituted or actual read. We note that the term 'validated' is defined in the glossary, therefore we suggest that this term be used. We suggest type 69 to be defined as: To perform a type 69 Substitution, the MDP must calculate the energy consumption between two Validated Meter Readings and pro-rata this calculated energy consumption for the number of days to produce a substituted Meter Reading.

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	The wording of clause 2.4.a.x creates a dependency on datastreams being active in MSATS for the meter data delivery timeframe to apply. We believe this clause should be updated because delivery to participants does not, and should not, be dependent on the datastream in MSATS. Also it would remove the conflict with clause 3.12.2 where timeframe for data delivery is defined without reference to datastreams in MSATS. We suggest clause 2.4.a.x be updated to: deliver validated metering data to all Participants with responsibilities for that NMI regardless of the NMI status or datastream status.

7. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
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8. Service Level Procedure Embedded Network Manager

Section	Description	Participant Comments
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9. Exemption Procedure Meter Installation Malfunctions

Section	Description	Participant Comments
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10. Other Issues Related to Consultation Subject Matter

Participant Comments			
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Procedure Consultation - Participant Response Pack