

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Endeavour Energy

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'Five-Minute Settlement Metering Procedure Changes – Package 2' Draft Procedures.

Please note, the change marked versions of the Draft Procedures highlights the changes required between the first stage Initial Draft Procedures and the second stage Draft Procedures.

The changes being proposed seek to enable 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
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3. Metrology Procedure: Part B

Section	Description	Participant Comments
13	Non-contestable unmetered loads	<p>Clause 13.1.2.d.v: This clause places an obligation on the MC to maintain the on/off time when the 'other' method of control is used. We believe that this obligation is overly too complex for little value. For example, if the device was a BBQ that is controlled by a person pressing a switch prior to usage then it would be difficult to define the on/off time for this load. We suggest that clause 13.1.2.d.v be deleted.</p> <p>Clause 13.1.3.a: we note that S7.4.3.item5 of the NER allows AEMO to classify a connection point as a type 7 metering installation (subject to consultation with the MC and the conditions listed under S7.4.3.item5). For future flexibility we suggest that 'any Unmetered Device classified by AEMO as a type 7 metering installation' be added as clause 13.1.3.a.iii. This would allow AEMO to classify a connection point with an unmetered device as a type 7 metering installation without having to go through formal consultation on this procedure.</p> <p>Clause 13.1.5.c: Unmetered Devices can be used as a non-contestable unmetered load however they will not be published in the Load Table. Therefore, for the avoidance of any confusion this clause should be updated to reflect this. We suggest the following wording: "No Registered Participant may use an Unmetered Device as a type 7 market load for which there is no load data in a Load Table"</p>

4. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
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5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
4.10	NMI Classification Codes	<p>Clause 4.10: We note that new NMI Classification Codes of DWHOLSAL and NREG have been introduced and the existing code of GENERATR has been redefined. However it is not clear who is expected to apply these codes, whether it is the LNSP or AEMO.</p> <p>With regards to the DWHOLSAL, NREG and GENERATR codes, the definition of these are dependent on parties, not related to the LNSP, deciding how they classify their generating unit or how they purchase energy. We believe that AEMO would become aware of these decisions because AEMO is involved in the registration/classification when such decisions are made. Therefore, for efficiency we expect that AEMO would be responsible for managing and updating these new NMI Classification Codes.</p> <p>To remove any confusion we suggest that clauses 2.9 be updated to clearly define AEMO being responsible for updating the NMI Classification Code of DWHOLSAL, NREG and GENERATR.</p>
11, 13, 15, 16, 17, 20, 21, 22, 23,	Inclusion of NCONUML	For consistency and completeness, NCONUML should be added to sections 35 and 36. Although there is no meter for NCONUML and therefore the

24, 25, 26, 27, 30, 31, 32, 39, 40		concept of having a MPB or MPC is redundant, it is common practice to align the participant of these roles with the MDP role.
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6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
Various	Inclusion of "DWHOLSAL" NMI Classification Code	<p>Clause 2.2.b: for completeness we suggest that DWHOLSAL be added to this clause. In addition, we suggest that SAMPLE be removed from this clause as the FRMP for a sample metering installation should never be allowed to change.</p> <p>Clause 4.2: Similarly, for completeness we suggest that DWHOLSAL be added to this clause. In addition, we suggest that SAMPLE be removed from this clause as the FRMP for a sample metering installation should never be allowed to change.</p> <p>Clause 25.2.b: for completeness we suggest that NREG, BULK, XBOUNDARY and DWHOLSAL be added to this clause</p>

7. National Metering Identifier

Section	Description	Participant Comments
VRH	Effective date updated to 1 July 2021	Clause 7.2.a: delete the redundant "L"
Appendix	Inclusion of appendix to better communicate	Table 5 in Appendix E: We note that some of the new NMI Classification

E	NMI Classification and Role requirements	<p>Codes are only effective from 06/02/2022 however they are shown in several scenarios prior to 06/02/2022. We suggest that for consistency these scenarios should be updated to only use appropriate values that available prior to 06/02/2022.</p> <p>Table 5 in Appendix E: for the below scenarios we note that the FRMP is LR%. However any Retailer is allowed to be the FRMP for this scenario. We suggest that the LR% be replaced with RetailerID%</p> <table border="1" data-bbox="1021 600 1912 772"> <tr> <td data-bbox="1021 600 1279 772">Contestable Unmetered Load</td> <td data-bbox="1279 600 1565 772">N/A</td> <td data-bbox="1565 600 1912 772"> Retail Customer NCC: SMALL or LARGE FRMP: LR% LR: LR% </td> </tr> </table> <p>Table 5 in Appendix E: for the below scenarios we note that the FRMP is LR%. However any Retailer is allowed to be the FRMP for this scenario prior to 06/02/2022. We suggest that the LR% be replaced with RetailerID%</p>	Contestable Unmetered Load	N/A	Retail Customer NCC: SMALL or LARGE FRMP: LR% LR: LR%
Contestable Unmetered Load	N/A	Retail Customer NCC: SMALL or LARGE FRMP: LR% LR: LR%			

		<table border="1"> <tr> <td data-bbox="1019 205 1274 528">Distribution to Distribution</td> <td data-bbox="1274 205 1565 528">N/A</td> <td data-bbox="1565 205 1888 528"> <p>X2 connection points NCC: XBOUNDRY FRMP: LR% LR: LR%</p> <p>NCC: XBOUNDRY FRMP: LR% LR: LR%</p> </td> </tr> </table>	Distribution to Distribution	N/A	<p>X2 connection points NCC: XBOUNDRY FRMP: LR% LR: LR%</p> <p>NCC: XBOUNDRY FRMP: LR% LR: LR%</p>
Distribution to Distribution	N/A	<p>X2 connection points NCC: XBOUNDRY FRMP: LR% LR: LR%</p> <p>NCC: XBOUNDRY FRMP: LR% LR: LR%</p>			

8. NEM RoLR Processes – Part A

Section	Description	Participant Comments
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9. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
2.4	Specific obligations for MDP - Category D	Clause 2.4.1.a.xiii: We note that the word “only” was removed, which now makes de-activation of datastreams mandatory for the listed scenarios. Previously the inclusion of the word “only” made the listed scenarios an option, and the only option, for de-activating datastreams. We believe that the removal of the word “only” has unintended consequences, especially for the scenario where the supply of electricity has been disconnected at

		<p>the service fuse. For efficiency MDPs should be given the option to leave the datastream on and send validated metering data they collect, as opposed to being forced to deactivate the datastream, when a metering installation is disconnected at the service fuse. Conversely, now that the clause no longer define the only option for deactivating datastreams, MDPs could read this clause as no longer restricting them from deactivating the datastream when the metering installation is remotely disconnected – this was one of the primary reason for wording this clause using the word “only” and listing the allowable scenarios for deactivating datastreams.</p> <p>We suggest that the word “only” be re-instated.</p>
3.12.4	Delivery of Settlements Ready Data	<p>Clause 3.12.4.b: For completeness calculated metering data for type 7 and non-contestable unmetered loads should be included in the table. We believe that the delivery timeframe should be more aligned with the Manually Read Metering Data because these loads are generally processed monthly and therefore the quality metric for preliminary and final should not apply. We suggest the metering data type be updated to “Manually Read and Calculated Metering Data”</p>

10. Exemption Procedure: Metering Installation Data Storage Requirements

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11. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
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