

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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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	
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	PLUS ES proposes to remove the ‘or’ between the words removed and configured.
2.4(g)		PLUES proposes that this clause is removed as it is superfluous. The 2.4 Clause begins with ‘An MDP must:’ and each of the identified clauses

Section	Description	Participant Comments
		includes wording to effect the Datastream 'A' or 'I'.
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	
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	
4.9	Table 4-E – NMI Classification	The marked-up version show has the table numbering with alphanumerical values and the clean version has the table naming with numerical values i.e. Table 4-E vs Table 4-5.
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.	

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).	<p>PLUS ES proposes rewording to remove ambiguity.</p> <p>Newly Purchasedpurchased from when? Need to be more definitive.</p> <p>If the intent is to mandate that CTs and VTs purchased after a particular date must comply with the standards then the date should be called out.</p>
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 verification	
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	<p>PLUS ES proposes an alignment of terminology between documents:</p> <p>Metrology Part A states the term 'Verification' of metering data for section 12.5, where the MPB SLP Section 4.2 uses the term 'Validating' metering data, when referencing Metrology Part A Section 12.5.</p>

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	
5.2.7	When to use Type 69 Substitution	
5.3.9	Addition of substitution type 69: Linear Interpolation	

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	
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	
4.2.(g)	Amend outdated rule reference	

Section	Description	Participant Comments
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	PLUS ES proposes an alignment of terminology between documents: MPB SLP Section 4.2 uses the term ‘Validating’ metering data, when referencing Metrology Part A Section 12.5 process, where Metrology Part A states the term ‘Verification’ of metering data for section 12.5.
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	

Section	Description	Participant Comments
	the AER.	
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	

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	

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

10. Other Issues Related to Consultation Subject Matter

Participant Comments
<p>PLUS ES maintains an MDP should be permitted to allow datastreams to remain open on inactive NMIs where a meter is (or remains) installed. By doing so, several benefits are achieved: -</p> <ol style="list-style-type: none"> 1. The MDP attempts to collect metering data on all installed meters irrespective of the NMI Status; 2. The MDP delivers metering data to both AEMO and market participants within the timeframes currently prescribed in the procedures without having to manage the activation of datastreams; 3. AEMO and market participants become aware of the presence of actual metering data as soon as the MDP becomes aware; 4. The obligation of managing actual consumption on in-active NMIs is placed on the LNSP – With both AEMO, the FRMP and the LR capable of escalating as required; and 5. The MDP reduces its exposure to NWADS. <p>Where an MDP elects to maintain active datastreams, the process should be as follows:-</p>

Participant Comments

- Attempt to read all installed meters daily;
- Provide actual metering data if and when it is collected from the meter; and
- Provide zero substitutions in the event metering data is not collected.

For the purposes of managing the current ADWNAN issues, the current reporting process should be modified to:-

- Make the LNSP responsible for any non-zero actual consumption on an inactive NMI; and
- Make the MDP responsible for any non-zero non-actual consumption on an inactive NMI.