

# METERING ICF PACKAGE CHANGES

## PROCEDURE CONSULTATION

## SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** *United Energy*

***Submission Date:*** *6<sup>th</sup> August 2019*

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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	
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	

Section	Description	Participant Comments
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	
4.18	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).	
12.5.(a)	Removal of obsolete standard AS2490	
12.5.(b)	New section added to detail Sample Test Plan settings	<p>United Energy believe this clause is only applicable to small customer metering installations i.e. only meters with minimum services specification under clause 7.8.3(a), clause 7.8.4(c) or clause 7.8.4(h)(2).</p> <p>All type 5 Victorian AMI meters will not be covered by this condition and as such we recommend that this clause be updated to include Victorian Type 5 AMI meters.</p> <p>General inspection and AQL levels need to be different for different</p>

Section	Description	Participant Comments
		systems. Most of Victorian DB's use communication cards permanently embedded with the meters and meters read through Network Management System. This results in a rare/zero chance of meter data validation failure. Defaults MC's should have the flexibility to select an Inspection level dependent on previous validation results/systems chosen. This can form part of each MDP's MAMS approved by AEMO.
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	

## 5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	

Section	Description	Participant Comments
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	United Energy systems are configured for Datastream and NMI status to align. The proposed change to deliver metering data while the NMI status is not Active will just move the issue, instead of resolving it. It will cause increased volumes of ADWNAN discrepancies. We do not support this change.
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	United Energy does not agree with the proposed request to update the Datastreams within two business days as this will cause a misalignment with the NMI Status which needs to be updated within 5 business days. It will also cause increased volumes of ADWNAN discrepancies. Our systems are currently configured for Datastream and NMI status to align. We do not support this change.
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.	
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.	

Section	Description	Participant Comments
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 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