

15 January 2018



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Dear Ms Zibelman

**Energy Queensland submission to Five Minute Settlement – Metering Procedure Changes (Package 1) Issues paper**

Energy Queensland welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the first stage of consultation for Five Minute Settlement – Metering Procedure Changes (Package 1) Issues paper (Issues Paper).

Energy Queensland's comments on the proposed changes to metrology documents and responses to the questions raised in the Issues Paper are provided in the attached participant response template.

Should AEMO require additional information or wish to discuss any aspect of Energy Queensland's submission, please contact me on (07) 3664 4105 or Peter Wall on (07) 3664 4968.

In the meantime, Energy Queensland will continue to contribute to this discussion via AEMO's Five Minute Settlement working groups.

Yours sincerely

A handwritten signature in black ink that reads "C. G. Martin".

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*Enc: Energy Queensland comments on the changes to Metering Procedures*

# FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Energy Queensland

***Submission Date:*** 15 January 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 'Five-Minute Settlement Metering Procedure Changes – Package 1' consultation.

The changes being proposed are as a result of the Australian Energy Market Commission making a final rule to align operational dispatch and financial settlement at five minutes, starting 1 July 2021.

The Rule change requires the collection, storage and delivery of revenue metering data based on five-minute intervals for use in energy settlement, network and retail billing.

## 2. Metrology Procedure: Part A

Section	Description	Participant Comments
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter.	Energy Queensland supports the proposed change.
7	Removal of South Australia requirement (2) Removal of Tasmania requirement (2)	Energy Queensland has no comments on this proposed change as it does not apply in Queensland.
12.2 (f)	Change to clause reference	Energy Queensland supports the proposed change.
12.8.2 (b)	Change in section reference	Energy Queensland supports the proposed change.
6	Addition to table:	Energy Queensland notes that specific provisions governing the

Section	Description	Participant Comments
	Embedded Networks	<p>relationship between parent and child meters in embedded networks apply in Victoria, South Australia and New South Wales, and considers that similar provisions would be useful for Queensland to clarify each party's responsibilities.</p> <p>Energy Queensland will consult with the Queensland Government on the charging of Child Meters or the Parent.</p>

### 3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to page references	Energy Queensland supports the proposed change.
11.2.1	Update to section reference to Metrology Procedure: Part A	Energy Queensland considers that the governance arrangements for the manual reading of interval meters can be strengthened (particularly for data collection for Type 4A metering installations).
11.2.2	Update to section reference to Metrology Procedure: Part A	Energy Queensland has no comment on this proposed change as it does not apply in Queensland.
11.2.3	Update to section reference to Metrology Procedure: Part A	Energy Queensland supports the proposed change.
11.3.1	Update to section reference to Metrology	Energy Queensland has no comment on this proposed change as it

Section	Description	Participant Comments
	Procedure: Part A 'Half hourly' reference updated to 'Interval'	does not apply in Queensland.
11.3.2	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Energy Queensland supports the proposed change.
11.4	Update to section reference to Metrology Procedure: Part A 'Half hourly' reference in formulas updated to 'TI' 'Half hourly' reference updated to 'Five minute' Updates made to formulas	Energy Queensland supports the proposed change. Energy Queensland also notes: <ul style="list-style-type: none"> <li>- "Y" should be changed to "y" to accurately reflect the formula</li> <li>- In the explanation of "Y" there is a spelling mistake in the word "representation"</li> </ul>
11.5	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Energy Queensland supports the proposed change.
11.6	Change end dates from '23:30' to '23:55'	Energy Queensland supports the proposed change.
12	New section added to detail the conversion of interval metering data, previous section 12, and following section numbering, have been changed due to this insertion	Energy Queensland supports the proposed change.

Section	Description	Participant Comments
13.1.4	Update to section references	Energy Queensland supports the proposed change.
13.2.2	Update to section reference to Metrology Procedure: Part A	Energy Queensland supports the proposed change.
13.2.4	Update to section references Update to formulas	Energy Queensland supports the proposed change.
13.2.5	Update to formulas	Energy Queensland supports the proposed change.
13.2.6	Update to section references Update to formulas	Energy Queensland supports the proposed change.
13.3	Update to section references	Energy Queensland supports the proposed change.
13.3.2	Update to section reference to Metrology Procedure: Part A	Energy Queensland supports the proposed change.
13.4	Update to section reference	Energy Queensland supports the proposed change.
13.5.2	Update to section reference to Metrology Procedure: Part A	Energy Queensland supports the proposed change.
13.5.4	Update to section reference Update to formulas	Energy Queensland supports the proposed change.
13.5.5	Update to formulas	Energy Queensland supports the proposed change.

Section	Description	Participant Comments
14.1	Update to section reference	Energy Queensland supports the proposed change.
14.3	Update to section reference	Energy Queensland supports the proposed change.

#### 4. Meter Data File Format (MDFF) Specification NEM12 & NEM13

Section	Description	Participant Comments
3.3.3	Included references to five-minute interval metering data	Energy Queensland supports the proposed change.
4.3	NMI data details record (200) - Added '5' to the Interval Length field Definition	Energy Queensland supports the proposed change.
Appendix H	Section added to include five-minute meter data file example	Energy Queensland supports the proposed change.



## 5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
4.4.4	Removal of NEM12 & NEM13 File Clarifications	<p>Energy Queensland supports the proposed change.</p> <p>Energy Queensland also suggests that paragraph (a) should be changed from “MDM File Format and Load Process” to “MDFF File Format and Load Process” or “MD File Format and Load Process”.</p>
5	Addition of various glossary items, including those from the ‘Meter Data Provision Procedure’	<p>Energy Queensland notes that some of the additional glossary terms have been taken directly from the Metering Data Provision Procedure and the wording should be amended to make better sense in this context. For example:</p> <ul style="list-style-type: none"> <li>- Interval Metering Data: From and To Date.</li> <li>- UOM – refers to a clause in another document</li> <li>- References to “the period of the request”.</li> </ul>

## 6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	<p>Energy Queensland supports the proposed change.</p> <p>However, in addition to the proposed changes to section 1.1, Energy Queensland requests that these procedures make it clear whether a DNSP must provide data to customers in the interval length as metered.</p> <p>For example, if a meter was recording data in 5 minute intervals, would the DNSP be obligated to provide data in 5 minute intervals or could they provide data in 30 minute intervals?</p>
1.2.1	Glossary removed and now included in the Retail Electricity Market Procedures – Glossary and Framework document	Energy Queensland notes that by moving this text to the <b>Retail Electricity Market Procedures</b> , some of the terms no longer make sense in their new context. Therefore, Energy Queensland suggests that this text be revised to ensure suitability.
1.2.2	Interpretation section removed from the document	Energy Queensland supports the proposed change.
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	Energy Queensland supports the proposed change.
3.4	New	Energy Queensland notes that 5 minute reads will significantly increase the size of data files. This presents challenges for the

Section	Description	Participant Comments
		<p>provision of the requested data in the mandated “single” file, especially where delivery is by electronic means. As such, Energy Queensland recommends the following small modification to the proposed new text:</p> <p><i>(a) Subject to clause 3.4(b), retailers and DNSPs must provide a <b>single</b> metering data file in relation to a retail customer’s metering installation for the requested period.</i></p>

## 7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	
<ul style="list-style-type: none"> <li>What is your view on the proposed profiling approach for 15 and 30-minute non-controlled load meter reads and why?</li> </ul>	<p>Energy Queensland broadly supports the proposal to profile 15 and 30 minute meter reads to 5 minute trading intervals to enable a consistent approach to pool settlements (01/07/2021 – 01/07/2023) including provision to FRMP of extrapolated 5 minute reads for BASIC (type 6) meters.</p>
<ul style="list-style-type: none"> <li>What is your view on the proposed profiling approach for 30-minute controlled load meter reads and why?</li> </ul>	
<ul style="list-style-type: none"> <li>Are there better profiling options to accommodate 5MS, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?</li> </ul>	<p>Energy Queensland supports the provision of a 5 minute and 30 minute profile during the transition phase.</p>
Meter Data Delivery to AEMO	

Heading	Participant Comments
<ul style="list-style-type: none"> <li>What are your views on AEMO transitioning to MDFF and why?</li> </ul>	<p>Energy Queensland supports the transition to a register level MDFF used by AEMO for NEM12/Interval data only. The 5 minute settlement changes do not justify any change to the current method of delivery for BASIC (Type 6) data delivery in the MDM format. This would be not cost justified for those MDPs who are only accredited for Type 6 meter installations, as 5 minute settlement should not have any impact on them.</p>
<ul style="list-style-type: none"> <li>What are your views on AEMO supporting the reception of register level meter data and why?</li> </ul>	<p>Energy Queensland notes that AEMO already receives register level data for Type 6 meters. Further, Energy Queensland notes the potential for data stream changes in MSATS to accept register level data from interval meters.</p> <p>However, we note that register level meter data does not address the mixed responsibility between MPB and MDP where the reading and delivery of meter data is independent of the publication of registers and data streams. Energy Queensland seeks procedural alignment between MPB/MDP and standing data tables &amp; CATS transactions, noting that MDFF is frequently delivered without supporting CATS transactions/standing data.</p>
<ul style="list-style-type: none"> <li>What are your views on MDPs sending the same files to both market participants and AEMO, energy and non-energy, and why?</li> </ul>	<p>Energy Queensland supports this approach for the NEM12 format only.</p> <p>Energy Queensland supports AEMO receiving non-energy interval data to support the transition of customer data provision.</p>
<ul style="list-style-type: none"> <li>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</li> </ul>	<p>Energy Queensland notes that changes to B2B rules and processes will be required to address the additional rejection codes and messages currently found in the MDM process. AEMO will face the same challenges currently experienced by existing recipients of MDFF data where the meter register and data streams may not align, and data may be received out of sync with CATS CRs.</p>