

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Endeavour Energy

Submission Date: 24 June 2019

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1. Context

This template is being provided 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 2' consultation.

The changes being proposed focuses on supporting 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
12.3, 12.4, 12.7	Provisions for non-contestable unmetered loads	<p>a) Clause 12.7.a.ii suggests that the calculated metering data for non-contestable unmetered load reflects the physical inventory. However it is common practice for an agreed load value to be used for non-contestable unmetered load, which may differ from the physical inventory's load. For clarity we suggest that clause 12.7.a.ii be updated to:</p> <p>arrange to test that the calculated metering data stored in the metering data services database reflects the agreed load value for the non-contestable unmetered load;</p>

Section	Description	Participant Comments
		<p>b) Clause 12.4 has been updated so that the MDP must send all metering data for market loads. However the effective start date of the document is 6 February 2022, we believe for the global settlement soft start to be successful this new obligation should start 1 July 2017.</p>

3. Metrology Procedure: Part B

Section	Description	Participant Comments
<p>6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4, 13.2.1, 13.3.1</p>	<p>Provisions for non-contestable unmetered loads</p>	<p>a) Clauses 13.1.2.b and 13.1.2.c requires the LNSP to publish a list of non-contestable unmetered loads and a Load Table for non-contestable unmetered loads. We note that the term 'publish' is defined term in the NER and in this context requires the list to be "... made available to Registered Participants electronically". We believe that these listings should only be made available to the FRMP and not any Registered Participant.</p> <p>b) We note that clauses 13.1.2.b, 13.1.2.c, 13.1.2.d and 13.1.e place obligations on the LNSP. However these responsibilities more closely align with obligations of an MDP because clause 12.3 of the Metrology Part A states that this information must be stored</p>

Section	Description	Participant Comments
		<p>within the metering data services database.</p> <p>Accordingly, we suggest that clauses 13.1.2.b, 13.1.2.c, 13.1.2.d and 13.1.e be updated as follow:</p> <p>(b) MDPs must create and maintain a list of non-contestable unmetered loads.</p> <p>(c) MDPs must create and maintain a Load Table for non-contestable unmetered loads.</p> <p>(d) MDPs must create and maintain an Inventory Table, in accordance with 13.2.2, for each non-contestable unmetered load NMI.</p> <p>(e) The MDP must provide the Inventory Table to the FRMP when requested.</p> <p>c) Clause 13.1.3.b should be a subclause under 13.1.3.a. We suggest renumbering 13.1.3.b to 13.1.3.a.iii and rewording to:</p> <p>Non-contestable unmetered loads result from the operation of Unmetered Devices that are not included in (i) or (ii)</p> <p>d) To minimise changes and cost, Networks should be able to assign a NMI to a single non-contestable unmetered load. Therefore, for</p>

Section	Description	Participant Comments
		<p>the avoidance of any doubt clause 13.1.4.a should be updated to reflect this – we suggest that this clause be reworded to:</p> <p>Metering data for an unmetered load is calculated by NMI Datastream. A NMI can be assigned for a single non-contestable unmetered load or for each unique combination of:</p>

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

Section	Description	Participant Comments
	<p>General</p>	<p>We note that the proposed effective start date of this document is 1 December 2020. We understand that this is to allow MDPs to start sending MDFF to AEMO from this date onwards, thus providing MDPs a transition period. However, a consequence of bringing the effective start date forward is that it also allows MDPs to send 5-minute metering data to registered participants prior to 1 July 2021 without an agreement from the registered participant. For the avoidance of any doubt we suggest a clause be added into this document that states 5-minute metering data cannot be sent to registered participants prior to 1 July 2021 without prior agreement.</p>

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
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6. MSATS Procedures: MDM File Format and Load Process

Section	Description	Participant Comments
	General	This document has a proposed effective start date of December 2020. From December 2020 to 30 June 2021 AEMO is proposing to accept interval metering via both MDM and NEM12, and from 1 July 2021 only via the NEM12. However, references to interval metering via MDM has been deleted. We suggest that this document be reviewed to ensure it reflects AEMO's intent for managing the transition.
1.1, 2.2, 3.1, 3.3, 3.4, 3.5, 3.7, 3.9, 3.10, 5.2, 5.2.5, 6	Provisions for MDFF (Meter Data File Format)	AEMO should consider how they want to manage metering data with a 'N' flag. AEMO could reject the metering data and not load it or load the metering data but include it in the RM11 report as missing data.

7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
4.9	Addition to and modification of NMI Classification Codes	<p>We support AEMO introducing new NMI Classification Codes to allow for better calculations of settlements and UFE. However we believe to gain the benefit of these new codes and existing codes that are re-defined then more detail needs to be provided for each of the code to ensure that they are used appropriately and consistently across the industry. We note that further information was provided, via industry forums, after the release of this consultation and believe that this valuable information should be incorporated into the procedures. We look forward to working with AEMO, via the industry forums, to help define and provide guidance on when to use each of the codes, which should include the following;</p> <ol style="list-style-type: none"> 1. Making it clear what type of connection point is applicable for each code. This includes clearly defining any energy threshold, connected technology and DNSP/TNSP connection criteria 2. Making it clear that if multiple codes are applicable for a connection point then what is the rules to determine which code is to be populated in MSATS 3. Making it clear if there are any other connection point or metering installation conditions for each of the code. For example, if only 1 NMI is expected for the connection point or if 2 NMI is expected. 4. Providing pictorial guidance on the use of each code in the NMI Procedure 5. Making it clear that these new codes must be used from 1 July

		<p>2021 for existing and new NMIs</p> <p>6. Provide guidance on the importance of these codes for the calculation of settlements and UFE by including the codes into the calculation formula and description clauses</p>
4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	Clause 4.12.1.a.iii should be updated to reflect that the datastream suffix is to at the register level.
4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	Clause 4.11.2 should be updated to reflect that the datastream suffix is also used to determine if the datastream will be used in the settlements process or the calculation of UFE.

8. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
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9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	We believe that this would be more appropriate in section 2.3 of the CATS Procedures. Also it should make it clear that the population of the LR role is option and if the LR role was to be populated then value must be

		"GLOPOOL"
2.4, 7	Provisions for non-contestable unmetered loads	Clause 2.4.a, 2.4.b and 2.4.c could be read as not allowing for a NMI to allocated to a single non-contestable unmetered load, which is the current approach for some Networks and should be allowed to continue. We suggest that for the avoidance of any doubt it should be made clear that a NMI can be allocated to a single non-contestable unmetered load. Please see our other comment in the Other Issues Related to Consultation Subject Matter section below.

10. NEM RoLR Processes – Part A

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

Section	Description	Participant Comments
2.4.1	Inclusion of 5 February 2022 reference	We note that this document is be effective from 1 December 2020 therefore clause 2.4.1.a.xii.B should not be referencing a future date of 5 February 2022. We suggest this new date reference be removed.
3.12.4	Changes to metering data quantity and	We believe that metering data from types 1, 2, 3 metering installations and

	quality requirements	type 4 metering installations at a transmission network connection point or distribution network connection point where the FRMP is a Market Generator or Market Small Generation Aggregator are important for the calculation of settlements and UFE. We suggest that the Remotely Read Metering Data category be sub-categorised to cover the above metering installations with a higher percentage than other type 4 metering installations. We also suggest that the remotely read meters have a quantity percentage that is equal or better than a manually read meter given the importance of interval metering data for settlements and UFE calculations. Please see below in the appendix for proposed changes to the table in clause 3.12.4.b.
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12. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
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13. Retail Electricity Market Glossary and Framework

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

Heading	Participant Comments
Non-contestable Unmetered Loads	
<ul style="list-style-type: none"> • How should non-market/contestable unmetered loads be processed and maintained in MSATS? <ul style="list-style-type: none"> ○ Should non-contestable unmetered loads with photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads and why? ○ Should non-contestable unmetered loads which do not have photoelectric (PE) cells be treated differently to those that do? If yes, how should these loads be treated? 	<p>We understand that the purpose of making non-contestable unmetered loads as market loads is to help with the calculation of Unaccounted for Energy (UFE). We also agree with AEMO’s assessment that determining the most appropriate way to managing these loads will require several iterations as the industry learn and better understand how these loads impact the UFE. In addition, it has been acknowledged by AEMO and industry that the calculated metering data for these loads will never truly reflect the actual consumption or load profile and that the option of installing a meter is always the better option from a UFE calculation perspective.</p> <p>On this basis we suggest that the initial approach for managing non-contestable unmetered loads should be minimal changes to existing industry practice and where changes are required then flexibility is provided to allow each Network to determine the option that is more aligned with their existing systems and processes. Once the UFE reports are published by AEMO during the global settlements soft start period industry can assess the impact of non-contestable unmetered loads on the UFE. We believe that the risk of such an impact will be very low given the small total volume of load from non-contestable unmetered loads. However, if the impact is significant enough then a review of managing non-contestable unmetered loads can be undertaken and further procedure changes can be introduced.</p> <p>This proposed approach allows for network business to focus on more important changes required for 5-minute settlements and global settlements and to ensure any investment on changes to the current approach for managing non-contestable unmetered loads will provide measurable industry benefits.</p> <p>Adding non-contestable unmetered loads into existing clauses that mention type 7 into the procedures is creating an expectation that non-contestable unmetered loads will be managed to the same level as type 7. This contrasts with the reason why non-contestable unmetered loads</p>
<ul style="list-style-type: none"> • What should be considered in creating and assigning 	

Heading	Participant Comments
<p>non-contestable unmetered NMIs in MSATS e.g. introducing a new Metering Installation Type Code (NCONUML) and why?</p>	<p>were not incorporated into type 7 in the first place and it does not provide sufficient flexibility to help balance cost versus industry benefits.</p> <p>We also note that S7.4.3.item5 of the NER allows for AEMO and the MC to determine when an unmetered load can be classified as a type 7, therefore we suggest that guidance be provided on the process for reclassifying a non-contestable unmetered load to be a type 7.</p>
<ul style="list-style-type: none"> • What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why? 	<p>We look forward to working with AEMO, via the industry forums, to help develop the draft procedures for managing non-contestable unmetered loads.</p>
<p>Effective start date of documents</p>	<p>We note that the effective start date of documents and the corresponding content within the documents do not support AEMO's intent, as communicated in working group forums, to allow for a transition starting from December 2020 and to start some obligations from 1 July 2021 to support the global settlements soft start. We suggest that AEMO review and update the documents to align not only with the Rule change but also the industry transition strategy, and build versions of the documents using these key milestone dates.</p> <p>For example, the CATS procedure has a proposed effective start date of 6 February 2022. However there are several changes that requires it to be effective from 1 July 2021 to support the global settlements soft start. To help with the transition to 1 July 2021 AEMO may want to make some of the changes available from December 2020. Therefore this document may need to have more than one version published in the draft determination based on different effective start dates.</p>
<p>Timeframe for feedback on draft</p>	<p>AEMO suggested that the draft determination be published on 5 August 2019 and feedback on</p>

Heading	Participant Comments
determination	<p>this draft determination be due 19 August 2019 – a period of 10 business days. We wish to highlight that significant changes were introduced in this initial consultation, including additional late information provided via the working group, and it is expected that the draft determination will contain more changes than this initial consultation, therefore we request that the due date for feedback on the draft determination be extended.</p> <p>We also note that there is a desire for the final determination to still be published on 30 September 2019 so not to delay the program or delay industry system design and builds which are dependent on the final determination.</p> <p>We suggest that the due date for feedback for the draft determination be extended to 2 September 2019 and maintain the publication of the final determination to 30 September 2019. This would allow for 20 business days for feedback on the draft determination (this is less than the feedback on the initial consultation, which allowed for 25 business days) and 20 business days for the final determination too (this is less than what was originally planned for, which was 30 business days). We believe that this would provide an appropriate balance for managing a significant change and through collaborative work via focus groups we believe that key issues can be addressed before the final determination.</p>
Communicating different versions of the procedures	<p>We acknowledge that one of the challenges for AEMO is how best to communicate the different versions of the procedures that have changed due to this program of work and other program of work, including showing the marked changes.</p> <p>We believe that it is important to bundle changes to procedures based on effective start dates as this will assist industry to understand the order of changes over the next few years. Providing mark changed versions based on the order of the effective start date of the procedures (and not the date of the consultation) is also important for industry to determine the changes for each</p>

Heading	Participant Comments
	<p>effective start date.</p> <p>The marked changed version should also be based on the final previous version. Currently AEMO's general approach is to accept all the changes in the draft determination and provide a a mark up from the draft determination when final determination is published. This results in the industry having to manually determine the changes from the current version to the final determination. Given the volume of changes, the number of procedures that are changing and the multiple versions of the same procedure due to different effective start date, this current approach is ineffective.</p>

Appendix 1: Proposed changes to the table in clause 3.12.4.b in the Service Level Procedure: Metering Data Provider Services

Metering Data Type	Metering installation	Service	Preliminary	Final	R1 or 4 month	R2 or 6 month
Remotely Read & Calculated Metering Data	types 1, 2, 3 metering installations and type 4 metering installations at a transmission network connection point or distribution network connection point where the FRMP is a Market Generator or Market Small Generation Aggregator	Quantity of Settlements Ready Metering Data	100%	100%	100%	100%
		Quality of Settlements Ready Metering Data with "A" or "F" quality flag	99%	100%	100%	100%
	Type 4 not covered above, type 7 and non-contestable unmetered loads	Quantity of Settlements Ready Metering Data	99%	100%	100%	100%
		Quality of Settlements Ready Metering Data with "A" or "F" quality flag	95%	98%	100%	100%
Manually Read Metering Data	Types 4A, 5 & 6	Quantity of Settlements Ready Metering Data	99%	99%	100%	100%
		Quality of Settlements Ready Metering Data with "A" or "F" quality flag	-	-	95%	100%