

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: VectorAMS

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	No comment.
12.4	Removal of 'First Tier' references	Agreed

3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2, 2.5, 3.2, 3.3.6, 3.3.8, 4.2, 4.3.3, 4.3.5, 4.3.6, 5.2.1, 5.2.6, 5.3.4, 5.3.6, 6.1, 6.2.4, 14.2.2, 14.3	Provisions for embedded network local retailers (ENLR)	Agreed
6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4, 13.2.1, 13.3.1	Provisions for non-contestable unmetered loads	Agreed
11.1.2, 11.1.3, 11.2.2, 11.2.3, 11.3.1, 11.3.2, 11.3.3, 11.4, 11.5, 12.3, 12.4	Removal of 'First Tier' and 'Second Tier' references	Agreed
11.2.1	Removal of 'Local Retailer (LR)' references	Agreed

Section	Description	Participant Comments
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	Agreed
11.4, 12.3	Provisions for 'bulk supply'	Agreed
12.4	Provisions for UFE (unaccounted for energy)	Agreed

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	Agreed

5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	Agreed

3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	Agreed
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	Agreed
3.2.15, 3.2.16	Provisions for 'bulk supply'	Agreed
3.2.15, 3.2.16, 9.2, 9.3, 9.4, 9.5, 9.6, 9.8, 9.9, 9.10	Provisions for embedded network local retailers (ENLR)	Agreed
3.2.16,	Removal of 'Local Retailer (LR)' references	Agreed
6.3, 6.4	Removal of aseXML csv payload tag reference	Agreed
9.5	Removal of MDM RM14 MDP Data Version Comparison report	Agreed
9.6	Removal of MDM RM15 Multiple Versions report	Agreed
9.9	Removal of MDM RM18 Electricity Interval	Agreed

	Data report	
Appendix A	Provisions for FTP and API delivery method	Agreed

6. MSATS Procedures: MDM File Format and Load Process

Section	Description	Participant Comments
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)	Agreed
1.3	Inclusion of additional 'Related Documents'	Agreed
3.6	Changes to table content	Agreed
3.7, 3.8, 3.9, 3.12, 4.4.1	Removal of sections, including references to netting and aggregating to 30-minute	
3.8, 5.1	Changes to MDMF content	Agreed

3.11	Inclusion of file size references	Agreed
4	Inclusion of Meter data messaging exchange content	<p>Vector does not agree with the proposed ‘information event’. Because of obligations to send data to market within 2 days of collection it is highly likely that AEMO will receive data prior to the establishment of standing data in MSATS. This is a normal situation that industry has dealt with for many years. There is no value in having this message as processes to update standing data are already underway and no additional action is required. This approach will just create a volume of transactions that will be ignored.</p> <p>It is important that AEMO clearly describes the validation rules it intends to apply when receiving meter data from MDP’s. Currently participants who received meter data understand the latency inherent in updating MSATS and generally perform little validation. Should AEMO have more restrictive validation rules then it is likely that this will create a situation where participant will be using different version of data in settlement processes.</p> <p>Figure 11 suggests AEMO is going to perform some level of validation on version date and will reject data if a earlier version is received. The principle already established in the market is that the latest version data takes primacy over data that has earlier dates. Participants do not currently reject meter data if they receive an earlier version. Participants systems are able to select the most recent data to cope for the situation where data arrives out of sequence. Current market protocols do not guarantee order of delivery to participants so AEMO should adopt the same approach.</p>
3.1, 3.3,	Provisions for FTP and API delivery method	Agreed.

3.10, 3.12, 4.2		
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7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments						
Quick Reference Guide, 3.4, 3.7, 3.7.2, 4.2	Removal of Change Reason Code 1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003, 4053, 5053, 5090, 5091, 6400, 6401	Agreed						
Quick Reference Guide, 2.2, 2.6, 3.6, 4.2, 4.3, 4.15, 9.5, 12.8, 15.7, 16.7, 17.7, 18.8, 19.8, 20.7, 21.7, 22.7, 23.7, 25.9, 25.10, 27.7, 28.7, 30.7, 31.8, 32.7, 33, 34.7, 35.8,	Provisions for embedded network local retailers (ENLR)	<p>CR 6421 still references LR Child. Should be ENLR.</p> <table border="1"> <tr> <td>6400, 6401</td> <td>Change LR</td> <td>Sec 33, Page 132</td> </tr> <tr> <td>6421</td> <td>Change LR Child NMI</td> <td>Sec 33, Page 137, 134</td> </tr> </table>	6400, 6401	Change LR	Sec 33, Page 132	6421	Change LR Child NMI	Sec 33, Page 137, 134
6400, 6401	Change LR	Sec 33, Page 132						
6421	Change LR Child NMI	Sec 33, Page 137, 134						

36.9, 37.1, 37.5, 39.7								
2.9, 3.2, 4.11.2	Removal of 'First Tier' and 'Second Tier' references	Agreed						
3.2, 3.4, 4.15, 7.5, 11.4, 11.7, 11.8, 13.4, 13.6, 13.7, 25.9, 26.7, 29.7, 33	Removal of Local Retailer (LR) references	Agreed						
3.7.1, 3.7.2	Changes in table references	Agree						
4.9	Addition to and modification of NMI Classification Codes	<p>Table 4-E is unclear on what it is trying to say for Victoria,NSA.ACT,SA for Large and Small. E.g.</p> <table border="1"> <tr> <td>INTERCON</td> <td><i>Interconnector</i></td> </tr> <tr> <td>LARGE ⁽¹⁾</td> <td> Victoria: >=160 MWh NSW: ACT: >=160 MWh SA: QLD: >=100 MWh TAS: >=150 MWh </td> </tr> <tr> <td><u>NCONUML</u></td> <td><i>Non-contestable unmetered load</i></td> </tr> </table> <p>What is this trying say? Is it differnet to the other 160MWh states?</p> <p>Agree witht the new codes.</p>	INTERCON	<i>Interconnector</i>	LARGE ⁽¹⁾	Victoria: >=160 MWh NSW: ACT: >=160 MWh SA: QLD: >=100 MWh TAS: >=150 MWh	<u>NCONUML</u>	<i>Non-contestable unmetered load</i>
INTERCON	<i>Interconnector</i>							
LARGE ⁽¹⁾	Victoria: >=160 MWh NSW: ACT: >=160 MWh SA: QLD: >=100 MWh TAS: >=150 MWh							
<u>NCONUML</u>	<i>Non-contestable unmetered load</i>							

4.12	Addition of 'Non-contestable Unmetered Load' Metering Installation Type Code	Suggest AEMO should clarify if a contestable MC can be assigned into the MC role over a NCONUML. Recommend MSATS restrict nomination to the Networks MC. Already metering providers are experiencing levels of incorrect nomination that must be reversed. Validation on these transactions at the time of raising the transaction will stop costly and unnecessary rework.
4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	Vector believes the use of NMI Datastream and NDS status codes should be revisited. Under a 'Settlement by difference' methodology NMI's included in settlements must be differentiated from those that are not. Under a Globals settlement methodology this is no longer be the case. All meters will need to be settled. While maintaining the status quo regarding CATS_NMI_DATASTREAM population is the path of least resistance requiring participants continue to create a Datastream for all meters and maintain the NDS status code is redundant. The switch to Global Settlements presents the opportunity to revisit and simplify the CATS data model, removing some processes and obligations and streamlining the market. This will lead to more efficient processes and reduced costs .i.e. use meter register and register identifier to understand the datastreams coming from the meter for settlement purposes. It is strongly recommended this should be considered.
Various	Updated table and section references throughout the document	

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

Section	Description	Participant Comments
Quick Reference Guide, 23	Removal of Chane Reason Code 1050, 1051, 6400 and 6401	Agreed.
9.7, 10.7, 11.7, 12.7, 13.7, 14.7, 15.7, 18.7, 20.7, 21.9, 22.7, 23, 25.8, 26.7, 27.1, 28.1, 28.5	Provisions for embedded network local retailers (ENLR)	Agreed.
5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7	Removal of Local Retailer (LR) references	Agreed.
Various	Updated table and section references throughout the document	

9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	Agreed.
2.2	Provisions for embedded network local retailers (ENLR)	Agreed.
2.4, 7	Provisions for non-contestable unmetered loads	No comment.
7, 9.3	Removal of net data and net datastream references	Agreed
3, 7.2	Provisions for 'bulk supply'	Agreed. Note that 7.2(a) refers to identifying a wholesale or bulk supply via the LR assignment "LR = POOL*" Should this be referring to the new NMI classification codes?
7, 9.3	Removal of meter data to AEMO requirements	Agreed.

10. NEM RoLR Processes – Part A

Section	Description	Participant Comments
2, 4.3.2,	Removal of Local Retailer (LR) references	Agreed

6.1, 11.3, 12.3		
2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, Appendix 1	Provisions for embedded network local retailers (ENLR)	Figure 2 continues to reference LR. Should this be changed?
6.1, 12	Removal of Second Tier references	Agreed
Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	Agreed but note that ROLR reports still reference first and second tier in the description. Under GS this concept not long exists.

11. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	Agreed
2.4.1	Inclusion of 5 February 2022 reference	It is unclear what 2.4.1 (xii).B is attempting to say. Is this saying that the MDP can only de-activate a Datastream for an for a first-tier NMI with an Accumulation Meter up until 5 February 2022? Suggest that this it reworded.
3.7.1	References to MDM format and MDMT transaction groups	Agreed

3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	Agreed
3.12.4	Provisions for MDPs to deliver AEMO all Datastreams related to settlements ready data and any other metering data configured in the metering installation to support UFE calculations	AEMO must clarify the requirement around providing reactive data value for use in UFE. Under the Rules all meters must be capable of measuring Reactive Energy however the obligations related to the recording and collection is 'where relevant' – 7.10.5. To date, meters are configured to collect and provide reactive energy based on the Network or Retail tariff requirement. It should be clarified that there is no requirement to collect reactive energy purely for UFE calculations.
3.12.4	Changes to metering data quantity and quality requirements	<p>Vector support the increase of SLA from the current level of 98% however also believes it is not reasonable to expect 100% for Quality ('A', 'F') compliance for Remotely and Manually Read meters. Collection of meter data in a small number of situations can be protracted and problematic. Generally these relate to combinations of loss of comms and access issues. MDP will provide substitutes but will not issue Finals until they have exhausted all efforts to get access to the meter. Requiring 100% recovery</p> <ul style="list-style-type: none"> • Is likely to encourage the MDP to provide a 'F'inal substitute over recovery of actuals. • will need to be supported with an exemption process o release MDP's of meeting 100% obligation. <p>Vector believes 99.9% for Quality is a reasonable SLA for Final, Revisions 1 and 2 settlement runs.</p>
3.12.5, 3.14.1,	Changes to method of delivery of data	Agreed

3.14.2		
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	Agreed

12. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		Unclear how AEMO arrived at a minimum requirement of 30 days for 5 minute data. The rule allows for an exemption on meeting memory requirements if all other regulations can be met. Should a meter met all other requirements but only store 28 days of readings at 5 mins would meet the requirement for an exemption. Vector recommends this abitary limit be removed and AEMO assess each application on its own merits.

13. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	

2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage Requirements	
2.6.2	Inclusion of bulk supply and/or cross boundary references	
5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	

14. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Implementing and transitioning to the changes in delivery of metering data to AEMO	
<ul style="list-style-type: none"> Do the proposed changes in the applicable initial draft change-marked procedures implement the required changes in section 2.2.5 in an effective manner? 	
<ul style="list-style-type: none"> Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new 	

Heading	Participant Comments
procedural requirements?	
<ul style="list-style-type: none"> • Is including transitional arrangements in the relevant procedures the most effective way of implementing transitional arrangements? If not, what would be the preferred alternative approach? 	
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 	

Heading	Participant Comments
<p>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>	
<ul style="list-style-type: none"> • What should be considered in creating and assigning non-contestable unmetered NMIs in MSATS e.g. introducing a new Metering Installation Type Code (NCONUML) and why? 	
<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>Service Levels for Meter Data Provider Services</p>	
<ul style="list-style-type: none"> • Will AEMO's proposed arrangements likely result in more accurate market 	<p>It is unlikely that there will be a material change in the accuracy of settlements as a result of changes to the SLA's. Problems with Data delivery usually manifest themselves when a meter is</p>

Heading	Participant Comments
settlements and why?	first commissioned and are resolved shortly thereafter. The vast majority of meters being installed are 'small' and have a load profile that is not material to overall accuracy of settlement.
<ul style="list-style-type: none"> What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements? 	Encourage the deployment of meters for unmetered supplies.
Exemption Procedure: Metering Provider Data Storage Requirements	
<ul style="list-style-type: none"> Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process for applying for a data storage exemption and why? 	