

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: CitiPower Powercor

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'Five-Minute Settlement Metering Procedure Changes – Package 2' Draft Procedures.

Please note, the change marked versions of the Draft Procedures highlights the changes required between the first stage Initial Draft Procedures and the second stage Draft Procedures.

The changes being proposed seek to enable 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 |
|---------------|--|----------------------|
| 3.1 | Requirements under National Measurement Act and Use of Standards | |
| 3.4 | "x" values – Calculation and Use | |
| 12.3, 12.7 | Provisions for non-contestable unmetered loads | |

3. Metrology Procedure: Part B

| Section | Description | Participant Comments |
|---------|--|----------------------|
| 12.3 | Profile Area five-minute load profile calculation | |
| 12.4 | Applying the five-minute profile to 15-minute and 30-minute metering data for a Profile Area | |
| 13 | Non-contestable unmetered loads | |
| Various | Inclusion of the word "affected" | |

4. MSATS Procedures: MDM Procedures

| Section | Description | Participant Comments |
|----------------|-------------------------------------|----------------------|
| 3.2.15, 3.2.17 | Unaccounted for energy (UFE) | |
| 5.2 | MDP Obligations | |
| 6 | LOAD DATA – INTERVAL NMI DATASTREAM | |
| 9.11- 9.14 | MDM RM Reports | |

5. MSATS Procedures: CATS Procedure Principles and Obligations

| Section | Description | Participant Comments |
|---------|--|--|
| 2.3 | Local Network Service Provider | |
| Various | Reference to NMI Procedures Appendix E | |
| 4.4 | Use of LR/ENLR within this Procedure | |
| 4.10 | NMI Classification Codes | <p>Use of mnemonic classification codes should still define these mnemonic classifications to include Small or Large.</p> <p>The NMI Classification has previously been used to identify small or large customers for the determination of retail contract obligations and the boundary for contestable metering within Victoria.</p> <p>However the introduction of the mnemonic NMI Classification code of NCONUML for “Non-contestable unmetered load” risks the small or large status not being easily identified. This will occur where such loads are being connected to both small or large NMI’s (Small, where an single agreed load UMS for a single customer occurs) or (Large, where a number of agreed load NC-UMS are allocated via a load table and inventory table to a single NMI for an enterprise customer like Vic Roads, Telstra or Melbourne City Council etc).</p> <p>It would be more informative to re-define the mnemonic NMI Classification codes to be:</p> |

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| | | <p>NCUML – L for Non Contestable Un-metered Load – Large NCUML – S for Non Contestable Un-metered Load – Small</p> <p>It is assumed all the other special mnemonic NMI Classification codes such as “Bulk” & “Generator” are either able to be defined as Large “by definition”, or do not warrant a Large / Small option such as “Sample”.</p> <p>CitiPower Powercor also proposes for consistency that the new meter type code for non-contestable unmetered loads be updated to NCUML.</p> |
| 4.12.2 | Datastream Status Codes | |
| 4.13.1 | Consequences of Allocating Certain Metering Installation Codes | |
| 5 | MSATS REPORTS | With the introduction of NCONUML, CitiPower Powercor, would like to request that the C4 - NMI Master Report - Master selection criteria be updated to allow for the input of meter type. (As per our response in clause 4.10 above) |
| Various | References to LR and ENLR | |
| 11, 13, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 30, 31, 32, 39, 40 | Inclusion of NCONUML | |

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| Various | Updated table references | |
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6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

| Section | Description | Participant Comments |
|---------|--|----------------------|
| 1.4 | WIGS Codes and Rules for a Change Request | |
| Various | Inclusion of "NREG" NMI Classification Code | |
| Various | Inclusion of "BULK" NMI Classification Code | |
| Various | Inclusion of "XBOUNDARY" NMI Classification Code | |
| Various | Inclusion of "DWHOLSAL" NMI Classification Code | |
| Various | Provisions for embedded network local retailers (ENLR) | |
| Various | Removal of Local Retailer (LR) references | |

7. National Metering Identifier

| Section | Description | Participant Comments |
|------------|--|----------------------|
| VRH | Effective date updated to 1 July 2021 | |
| Appendix E | Inclusion of appendix to better communicate NMI Classification and Role requirements | |
| 2.4 | Allocation of NMIs for non-contestable unmetered loads | |
| 6 | Changes to DATASTREAM SUFFIX | |
| A.19, A.20 | Non Contestable Unmetered Load – One NMI With Multiple Devices | |

8. NEM RoLR Processes – Part A

| Section | Description | Participant Comments |
|---------|--|----------------------|
| Various | Removal of first and/or second tier references | |
| Various | Provisions for ENLR | |

9. Service Level Procedure: Metering Data Provider Services

| Section | Description | Participant Comments |
|---------|---|--|
| 2.4 | Specific obligations for MDP - Category D | |
| 3.7 | Metering Data Processing Requirements | |
| 3.10.2 | Non-contestable Unmetered Load Calculation Methodologies and Agreed Loads | |
| 3.12.4 | Delivery of Settlements Ready Data | <p>CitiPower Powercor disagrees with separation of RRIM from MRIM under type 5 as remaining MRIM sites are either customer refusals or have access issues which we have been unable to be replace with RRIM's therefore required quality standards are unlikely to be met.</p> <p>The change to separate MRIM's will either see an increase in the issue of F to A's as MDP's will final sub to meet settlement quality % requirements prior to the meter memory capacity expiring or a failure to meet the required SLA's.</p> <p>CitiPower Powercor proposes that AEMO provide an exemption for those MRIM NMI's that are identified as having customer refusal or have access issues from these delivery targets.</p> |
| 3.12.5 | Method of Delivery of Data | |
| 5 | METER CHURN DATA MANAGEMENT | |

10. Exemption Procedure: Metering Installation Data Storage Requirements

| Section | Description | Participant Comments |
|---------|---|--|
| 1.1 | Purpose and scope | |
| 1.2 | Definitions and interpretation | |
| 2 | APPLICATION PROCESS | |
| 2.5.2 | Additional considerations for VICAMI Meters | <p>CitiPower Powercor proposes that clause (a) date be updated from 1 July 2018 to 1 July 2021.</p> <p>While it is noted that new and replacement meters installed from 1 December 2018, it is also noted that the NER rule 7.8.2(a) allows AEMO to issue Exemptions for certain types of meters installed up to 1 July 2021.</p> <p>The Victorian Government Order in Council is not prescriptive as to the limiting install date for exemption of Victorian AMI meters, however it is reasonable to at least apply the same 1 July 2021 date:</p> <p><i>(4) For clauses 7.8.2(a1)(1) and (2), substitute:</i></p> <ul style="list-style-type: none"> <i>(1) types 1, 2, 3, and 4 metering installations installed prior to 1 July 2021;</i> <i>(2) type 4 metering installations referred to in clause 7.8.2(b1) installed prior to 1 July 2021; and ;</i> <i>(3) a relevant metering installation that is a complying remotely read interval meter.'</i> |

11. Retail Electricity Market Glossary and Framework

| Section | Description | Participant Comments |
|---------|-------------|--|
| 2.7.7 | Exemptions | |
| 5 | GLOSSARY | |
| | | <p>CitiPower Powercor recommends, for clarity, the term/s 'MRIM / MRIM RWD meter' be added with an explanation of 'A meter installed in Victoria as part of the Advanced Metering Infrastructure mandate in Victoria'. In MSATS, such MRIM RWD meters are recorded as Type 5 meters.</p> <p>At least 3 of the 5 Victorian distributors use this instead of 'VICAMI Meter' as VICAMI Meter has implications in terms of the Validation/Substitution rules to be applied under Metrology Procedure Part B.</p> <p>The Victorian Order in Council GG21017S346 dated 12 October 2017 specifically defines Victorian AMI Meters (relevant metering installations) as Type 5 metering installations not type VICAMI metering installations.</p> <p>7.1.2 Application to Victoria</p> <p>(b) In this Chapter 7, a relevant metering installation that, but for it being capable of remote acquisition, would be a type 5 or type 6 metering installation <u>is taken to be a type 5 or type 6 metering</u></p> |

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| | | <p><u>installation respectively.</u></p> <p>(e) In this Chapter 7, for the purposes of clause 7.8.9(b) and (c), a relevant metering installation with a complying remotely read interval meter <u>is a type 5 metering installation</u> that has been altered to make it capable of remote acquisition’.</p> |
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