

15 February 2018



Audrey Zibelman  
Chief Executive Officer  
Australian Energy Market Operator  
GPO Box 2008  
Melbourne VICTORIA 3001

[5ms@aemo.com.au](mailto:5ms@aemo.com.au)

Dear Ms Zibelman

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

Energy Queensland welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its Draft Determination for Five Minute Settlement – Metering Procedure Changes (Package 1).

Energy Queensland's comments on the proposed changes to metrology documents 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) 3851 6787 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 "Trudy Fraser".

Trudy Fraser  
**Manager - Policy and Regulatory Reform**

Telephone: (07) 3851 6787 / 0467 782 350

Email: [trudy.fraser@energyq.com.au](mailto:trudy.fraser@energyq.com.au)

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

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

## PROCEDURE CONSULTATION

## SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:***            *Energy Queensland*

***Submission Date:*** *15 February 2019*

# Table of Contents

- 1. Context ..... 3
- 2. Metrology Procedure: Part A..... 3
- 3. Metrology Procedure: Part B..... 5
- 4. Meter Data File Format (MDFF) Specification NEM12 & NEM13 ..... 8
- 5. Retail Electricity Market Glossary and Framework ..... 9
- 6. Meter Data Provision Procedure ..... 9
- 7. Other Issues Related to Consultation Subject Matter..... 10

## 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
3.2	A type 4A or 5 metering installation must have an optical port that meets the AS 1284.10.2 or AS 62056.21 or a computer serial port to facilitate downloading of 90 days of interval energy data for each Datastream associated with the metering installation in 90 seconds or less.	Energy Queensland supports the proposed change.
3.5	Jurisdictional Update	Energy Queensland supports the proposed change.  However, we note that in the Queensland material in the table in clause 3.5 (b), paragraph (a), contains a reference to paragraph (c) which, due to the redrafting, is different to the new clause (c) (i.e. the previous

Section	Description	Participant Comments
		<p>paragraph (d)).</p> <p>Energy Queensland suggests that the reference to paragraph (c) should be removed from paragraph (a) – i.e. delete the text “<i>in accordance with (c), below</i>”.</p>
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.
6	Jurisdictional Update	Energy Queensland has no comments on this proposed change as it does not apply in Queensland.
7	Jurisdictional Update	Energy Queensland has no comments on this proposed change as it does not apply in Queensland.
9.3	Jurisdictional Update	Energy Queensland supports the proposed change.
12.2	Jurisdictional Update	Energy Queensland supports the proposed change.
12.4	Jurisdictional Update	Energy Queensland has no comments on this proposed change as it does not apply in Queensland.
12.5	To validate that all metering data stored in the metering data services database is consistent with the energy data stored in the metering installation or the Physical Inventory (as applicable),	Energy Queensland supports the proposed change.

### 3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.3	Jurisdictional Update	Energy Queensland has no comments on this proposed change as it does not apply in Queensland.
2.4	Change to 'F' Metering Data Quality Flag	Energy Queensland supports the proposed change.
2.6	Page number links replaced with section links	Energy Queensland supports the proposed change.
3.3.8	Change to Type 18 – Alternative wording	Energy Queensland supports the proposed change.
3.3.11	Addition of Type 21 - Five-minute Conversion No Historical Data	Energy Queensland supports the proposed change.
4.3.3	Changes to Type 53 - Revision of Substituted Metering Data	Energy Queensland supports the proposed change.
4.3.9	Addition of Type 59 – Five-minute Conversion No Historical Data	Energy Queensland supports the proposed change.
11.2.1	Update to section reference to Metrology Procedure: Part A	Energy Queensland has no comments on this proposed change as it does not apply in Queensland.
11.2.2	Update to section reference to Metrology Procedure: Part A	Energy Queensland supports the proposed change.
11.2.3	Update to section reference to Metrology	Energy Queensland has no comments on this proposed change as it

Section	Description	Participant Comments
	Procedure: Part A	does not apply in Queensland.
11.3.1	Update to section reference to Metrology Procedure: Part A  'Half hourly' reference updated to 'Interval'	Energy Queensland supports the proposed changes.
11.3.2	Update to section reference to Metrology Procedure: Part A  Change end dates from '23:30' to '23:55'	Energy Queensland has no comments on the proposed changes as it does not apply in Queensland.
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 changes.
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 changes.
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	Energy Queensland supports the proposed change.

Section	Description	Participant Comments
	of interval metering data, previous section 12, and following section numbering, have been changed due to this insertion	
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 changes.
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 changes.
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	Energy Queensland supports the proposed changes.



Section	Description	Participant Comments
	Update to formulas	
13.5.5	Update to formulas	Energy Queensland supports the proposed change.
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
2.6.3	Update to TI	Energy Queensland supports the proposed change.
4.4.4	Removal of NEM12 & NEM13 File Clarifications	Energy Queensland supports the proposed change.  Energy Queensland notes that AEMO will consider a change of name for the document as part of the consultation for Package 2. However, in our previous submission, Energy Queensland merely suggested that the <u>subtitle</u> of paragraph (a) be changed from “ <i>MDM File Format and Load Process</i> ” to “ <i>MDFF File Format and Load Process</i> ” or “ <i>MD File Format and Load Process</i> ”.
5	Updates to various Glossary items	Energy Queensland supports the proposed change.

## 6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	Energy Queensland supports the proposed change.
1.2.1	Various updates	Energy Queensland supports the proposed changes.

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
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.
2.3	Update to section (d)	Energy Queensland supports the proposed change.
3.4	Removal of 'single'	Energy Queensland supports the proposed change
4.1	Change to character length	Energy Queensland supports the proposed change.

## 7. Other Issues Related to Consultation Subject Matter

<b>Heading</b>	<b>Participant Comments</b>
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	Energy Queensland supports the approach proposed by AEMO.
Meter Data Delivery to AEMO	<p>Energy Queensland supports the proposed changes to the delivery of meter data, whereby AEMO will continue to support and accept MDMF files for BASIC meter reads.</p> <p>Energy Queensland also supports the gradual transition of Net data stream records to register level data streams but would like to see a more structured time-line applied to</p>

<b>Heading</b>	<b>Participant Comments</b>
	this, and an indication of how the MPBs and MDPs would coordinate updates to the CATS NMI Data Stream table so the MDM Contributory Suffix on the Meter Register is kept in-line with Data Stream changes.