# METERING ICF PACKAGE CHANGES

# PROCEDURE CONSULTATION

# FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

**Participant**: Momentum Energy

**Submission Date**: Friday 24th May 2019~~To be Discussed~~

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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 Metering ICF Package Changes consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

# 2. MSATS Procedures: CATS

| Section | Description | Participant Comments |
|---------|-------------|----------------------|
| 2.1(i) | Reduction of timing for updating CATS Standing Data from 20 to 10 business days | Agree to the proposed update |
| 2.1.(l) | New section added to clarify the communication of the identification of incorrect NMI | The terminology 'Promptly' is too vague and left to the interpretation of the participants, recommend to articulate the actual number of days, a Participant must take action after becoming aware of incorrect CATS Standing Data . Suggest 5 business days as the inaccuracy has an impact on wholesale settlement which is on a weekly basis |
| 2.4.(c) | Updated to define timeframes for updating datastreams in MSATS | Agree |
| 2.4.(d) | Updated to define timeframes for updating datastreams in MSATS | Agree |
| 2.4.(e) | Updated to define timeframes for updating datastreams in MSATS | Agree |

| Section | Description | Participant Comments |
|---------|-------------|---------------------|
| 2.4.(f) | Updated to define timeframes for updating datastreams in MSATS | Agree |
| 2.4.(h) | Updated to define timeframes for updating datastreams in MSATS | Agree |
| 2.5.(a) | New section added to define the dates MPs must use when updating MSATS about remote de-energisations | Agree |
| 2.5.(b) | New section added to define the dates MPs must use when updating MSATS about remote re- energisations | Agree |
| 4.18 | Updated to clarify the LNSP's obligations in relation to creating Embedded Network Codes and ENM's obligations in relation to application of the Embedded Network Code and data provided to AEMO upon appointment. | Agree |

## 3. MSATS Procedures: WIGS

### 3.

| Section | Description | Participant Comments |
|---|---|---|
| Version | Updated to align version numbering with MSATS: CATS procedures | Agree to the update of the document version and the revised way to identify the tables within the document |

# 4. Metrology Procedure: Part A

5.

| Section | Description | Participant Comments |
|---------|-------------|----------------------|
| 3.1.(a) | Update to remove the word 'relevant' | Suggest the following: <br><br> Meters used in type 1, 2, 3, 4, 4A, 5 and 6 metering installations, must comply with *all* applicable specifications or guidelines (including transitional arrangements) specified by the National Measurement Institute under the National Measurement Act, and must also meet *all* the requirements of the Australian Standards and International Standards: |
| 3.1.(b) | Update to remove the word 'relevant'; add requirements of AS60044.3 or IEC61869.1 and IEC61869.2; and detail what each topic the part of the standard covers | Suggest the following for clarity: <br><br> CTs for type 1, 2, 3, 4, 4A , 5 and 6 metering installations,  must meet the requirements of AS 60044.1, ……, |
| 3.1.(c) | Update to remove the word 'relevant'; add requirements of IEC61869.1 and IEC61869.3; and detail what each topic the part of the standard covers | Suggest the following for clarity: <br><br> VTs for type 1, 2, 3, 4, 5 and 6 metering installations,  must meet the requirements of AS 60044.2 ….. |
| 3.1.(d) | Update to include International Standards covered in 3.1.(b) and 3.1.(c). | Suggest the following for clarity: <br><br> New CTs  and VTs must comply with current Australian Standards or |

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| Section | Description | Participant Comments |
|---------|-------------|----------------------|
| | | International Standards as identified in Sections 3.1 (b) and 3.1(c) |
| 12.5.(a) | Removal of obsolete standard AS2490 | Suggest a change to the following to retain consistency within the Metrology Procedure: |
| | | Replace the word 'Each' with 'The' to indicate the verification must be carried out by the Current MC. |
| 12.5.(b) | New section added to detail Sample Test Plan settings | Refer to 12.5(a) |
| 12.5.(c) | New section added to specify when a test sample is deemed to have passes the verification test | Suggest inserting a comma after the word database to emphasise the intent and provide clarity to the participants when there is a discrepancy or anomaly between the metering data and the energy data: |
| | | *A test sample is deemed to have passed the verification test when the metering data stored in the metering data services database, is consistent with the energy data in the metering installation.* |
| | | *If the metering data stored in the metering data services database, does not match the energy data stored in the metering installation, then the test sample is deemed to have failed the verification test and must be rectified* |
| 12.5.(d) | New section added to specify when the steps to be followed after each round of verification | Refer to 12.5(a) |
| | | The MC must take the following steps  after each round of verification: |

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| Section | Description | Participant Comments |
|---------|-------------|---------------------|
| 12.5(d)(ii) | | If the two *consecutive* rounds pass, then on the third round switch back to a normal inspection sample size |
| 12.5.(e) | Update to specify that verification tests must be conducted at least one every 12 months | To assist MC meter management incuding test sample verification, suggestion is to revise for clarity:<br><br>Verification tests must be conducted in accordance with the Sample Test Plan once every 12 *consecutive* months |

## 6. Metrology Procedure: Part B

## 5.

| Section | Description | Participant Comments |
|---------|-------------|---------------------|
| 2.6 | Update to include additional substitution type 69 | Agree to inclusion |
| 5.3.9 | Addition of substitution type 69: Linear Interpolation | Please update:<br><br>To perform a type 69 Substitution, the MDP must calculate the ADL between two validated Meter Readings and apply this *calculated* ADL pro-rated to the number of days for the substituted read |

## 7.6.    Service Level Procedure Meter Data Provider Services

| Section | Description | Participant Comments |
|---|---|---|
| 2.4.1.(ix) | New section added to define an obligation to activate datastreams when energy is recorded from a metering installation while the NMI status is not Active | *Specific Obligations for MDP – Category D / Generally*<br><br>*Activate Datastreams in MSATS within 1 business day when the MDP becomes aware that energy is being recorded from a metering installation and deliver validated metering data to AEMO regardless of NMI status.*<br><br>*The above is based on SLP : Metering Data Provider Services Section 7.3 (b) – Corrective Action*<br><br>*where the MDP becomes aware that incorrect metering data has been delivred to AEMO and Registered participants, the MDP must provide corrected metering data to all affected parties, as required by NER clause 7.10.2(e) within one business day of detection.* |
| 2.4.1.(x) | New section added to define an obligation to deliver validated metering data to market participants when datastreams are active | *Specific Obligations for MDP – Category D / Generally*<br><br>Agree |
| 4.2.(g) | Amend outdated rule reference | **Time Settings**<br><br>Agree |
| 6.4.1.(c) | Amend outdated rule reference | **Access to data** |

| Section | Description | Participant Comments |
|---------|-------------|----------------------|
|         |             | Agree |
| 7.3.(b) | Amend outdated rule reference | **Corrective Action**<br><br>Agree |

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# 8. Service Level Procedure Meter Provider Services

# 7.

| Section | Description | Participant Comments |
|---|---|---|
| 4.2.(a)(iii) | Amend outdated rule reference | **Metering Data Validation Requirements**<br><br>*Refer to the feedback for Metrology Procedure Part A Section  12.5(a)-12.5(e)* |
| 5.2.(a) | Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification. | Management of Metering Installation Malfunctions (Reference NER v 121 Setion 7.8.10(aa)<br><br>Agree |
|  |  |  |

# ~~9.~~ Service Level Procedure Embedded Network Manager

**8.**

| Section | Description | Participant Comments |
|---------|-------------|----------------------|
| 2.1.2.(d) | New section added to define an obligation that the EN for which the ENM has been appointed has an exemption by the AER. | *Please take into consideration for clarity and interpretation*<br><br>*Ensure the Embedded Network Owner (ENO) has secured an exemption from the AER and is registered as a Network Service Provider*<br><br>*Additionally  the term ENO -  with the definition 'Embedded Network Owner' to be added to Section 5 - Glossary of the Retail Electricity Market Procedures – Glossary and Framework v3.1* |
| 4.2.1. | Updated to clarify ENM's obligations with respect to DLFs. | *Agree to update* |
| 4.2.2. | Updated to clarify ENM's obligations with respect to DLFs. | *Suggest the following narrative:*<br><br>*Section 4.2.2 Site-specific DLF*<br><br>*EENSP calculates the DLF Code for the Parent NMI and also the site-specific DLF Code for Child connection point if and when required.*<br><br>*The ENM must:*<br><br>*(a)  Assign the related site-specific DLF Code to the Child NMI as the DLF Code in accordance with MSATS Procedures*<br><br>*(b)  Liaise with AEMO to have the site-specific DLF Code created in* |

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| Section | Description | Participant Comments |
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| | | *MSATS* <br><br> *(c) Provide to AEMO, for publication by 1 April each year, the site-specific DLF codes and the related DLFs.* |
| 4.3.3.(a) | Updated to clarify ENM's obligations with respect to Network Tariff Codes. | Agree and suggest update based on information detailed in Section 2.1.2(d) <br><br> *(a) Liaise with the Embedded Network Owner (ENO) to ensure that the Network Tariff Code assigned by the MPB when the meter was recorded in MSATS for a Child NMI is valid; and* |
| | | |

## 10.9.    Exemption Procedure Meter Installation Malfunctions

| Section | Description | Participant Comments |
|---------|-------------|---------------------|
| 1.1. | Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification. | |
| 2.2. | Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and | |

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| Section | Description | Participant Comments |
|---|---|---|
|  | rectification. |  |
| Appendix A | Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification. |  |
| Appendix B | Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification. |  |

## 11.10.  Other Issues Related to Consultation Subject Matter

| Heading | Participant Comments |
|---|---|
| Are there better options to accommodate the change proposals, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented? |  |
| What are the main challenges in adopting these proposed changes? How should these challenges be |  |

| Heading | Participant Comments |
|---|---|
| addressed? | |