

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: VECTORAMS

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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.(l)	New section added to clarify the communication of the identification of incorrect NMI	<p>Recommend that this should be ‘affected’ Participants for consistency. Concerns raised in initial consultation submission remain. This clause will inadvertently capture all standing data updates and not just those that are material. Use of MSATS Change Requests to notify parties could be seen as meeting this requirement. VECTORAMS is unsure if this is the intent. If Participant ‘A’ informs Participant ‘B’, is Participant ‘B’ obligated to tell Participant ‘C’ or do they assume Participant ‘A’ will do this?</p> <p>Current uncertainty on the interpretation will lead to disputes on whether this clause has been met or not. This seems to be a motherhood statement. Recommend drafting be more specific to the ICF issue that was raised, or proposed clause removed.</p>
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	Current procedures give MDP’s the discretion on whether Datastreams are left active when a connection point is deenergised. The proposed drafting now

Section	Description	Participant Comments
		<p>remove this discretion which is not in the scope of the ICF which purely requested a obligation for timely updating of the Datastream status <i>should</i> the MDP choose to update it. VECTORAMS believes the current flexibility should remain and recommends the intent of the ICF can be met by reverting the proposed drafting back to the current drafting and place the timing obligations in the MDP SLP.</p> <p>SLP clause 2.4.1 could be updated with the following.</p> <p>“Where the MDP is required to update the Datastreams status (‘A’ctive, ‘I’nactive), MSATS must be updated within two business days of the becoming aware of the change in connection point energisation state.”</p> <p>See futher comments on SLP section below.</p>
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	See comment or 2.4(c)
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	See comment or 2.4(c)
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	<p>It is unclear if this clause only applies to the current MDP at all times or when they are becoming the current MDP. If this is to apply in all scenarios then</p> <p>“or as required when the MDP becomes the Current MDP” could become “ or as required.” to remove the ambiguity.</p>

Section	Description	Participant Comments
2.4.(g)	(g) Configure the Datastream as 'A' (Active) or 'I' (Inactive) in accordance with clause 2.4 (c), (d), (e) and (f).	This clause is redundant as it is just pointing to already existing clauses.
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	Agreed
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	Agreed
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	Agreed
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.	No Comment

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	Agreed

4. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1.(a)	Update to remove the word 'relevant'	Agreed
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	Agreed
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	Agreed
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	Agreed
12.5.(a)	Removal of obsolete standard AS2490	Agreed
12.5.(b)	New section added to detail Sample Test Plan settings	Agreed
12.5.(c)	New section added to specify when a test sample is deemed to have passes the verification test	Agreed
12.5.(d)	New section added to specify when the steps to be followed after each round of	Agreed

Section	Description	Participant Comments
	verification	
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	Agreed

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	Agreed
5.3.9	Addition of substitution type 69: Linear Interpolation	Agreed

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	<p>Is referencing MSAT 2.4(e) necessary? MSATS 2.4(e) only refers to MDP taking action when a connection point has been 're-energised'. If the MDP recognises consumption at a deenergised site then it has no knowledge of the date that the connection point was re-energised as required by 2.4(e). It can only update the Datastream from the date it saw consumption.</p> <p>Also this should be 5 business days to remain consistent with existing obligations to update MSATS on the MP and LNSP.</p>
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	Should be 5 business days to remain consistent with existing obligations to update MSATS on the MP and LNSP
2.4.1	Add new clause to MDP around timing to update datastream in MSATS	<p>Current procedures drafting give MDP's the discretion on whether Datastreams are left active when a connection point is deenergised. The proposed drafting now remove this discretion which is not in the scope of the ICF which purely requested a obligation for timely updating of the Datastream status <i>should</i> the MDP choose to update it. VECTORAMS believes the current flexibility should remain and recommends that the proposed drafting in the MSATS procedure be reverted to the original and any timing obligations put In the MDP SLP. Clarification on generation of substitutions could be added if necessary (in preparation for the 5MS metering package 2 changes to this clause).</p>

		<p>SLP 2.4.1((x) (D) should read:</p> <p>(D) where the supply of electricity has been <i>disconnected</i> at the service fuse and the MDP will not be providing appropriately substituted metering data; or</p> <p>SLP clause 2.4.1 should be updated with the following.</p> <p>“Where the MDP is required to update the Datastreams status (‘A’ctive, ‘I’nactive), MSATS must be updated within two [five] business days of the becoming aware of any change in connection point energisation state.”</p>
4.2.(g)	Amend outdated rule reference	Noted
6.4.1.(c)	Amend outdated rule reference	Noted
7.3.(b)	Amend outdated rule reference	Noted

7. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2.(a)(iii)	Amend outdated rule reference	Noted
5.2.(a)	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted

8. Service Level Procedure Embedded Network Manager

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.	Noted
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	Noted
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	Noted

Section	Description	Participant Comments
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	Noted

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.	Noted
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted
Appendix B	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted

10. Other Issues Related to Consultation Subject Matter

Participant Comments

A number of these changes require participants to make system changes. VECTORAMS raised this in the first round and AEMO indicated that the effective date had already been determined by the ERCF prior to the consultation commencing. Setting a date for delivery before the detailed work has completed (in this case the consultation process) is flawed. Taking a time boxed approach must allow for scope to be reduced should the level of change be greater than originally anticipated which VECTORAMS believes is the case in this instance.

VECTORAMS recommends that the effective date for changes related to ICF_M005 be deferred until August 2020 so that systems can be changed to meet these new obligations.