RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**:* *AGL*

***Submission Date**:* *4 June 2021*

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the Retail Electricity Market Procedures March 2021 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. Service Level Procedure: Metering Data Provider Services (SLP: MDP Services)

Section	Description	Participant Comments
2.4.3 Reactive Energy	Amend the wording to read: (a) Subject to paragraph (b), where the *metering installation* is configured to measure *reactive energy*, the MDP must store this *metering data* with the *metering data* in respect of *active energy* in the *metering data services database*. (b) The *MDP* is not subject to the storage requirement in paragraph (a), if the *metering data* in respect of *reactive energy* as measured by a Type 4 *small customer*, type 5 or VICAMI *metering installation* is not required for the current purposes of either: (i) provision to a requesting party, as may be required for the purposes of additional services under NER 7.4.3; or (ii) application of a *reactive energy*-based network tariff or if required by the FRMP in order to calculate the energy user's bill.	AGL supports the amendments to the initial proposal.

Section	Description	Participant Comments
New clause 2.4.1(a)(ix)	Insert new clause: Ensure that systems and processes are in place to detect *energy data*, at least every 20 business days, when the datastream is not active for a *metering installation* with *remote acquisition*.	AGL supports the change.
Renumbered clauses	Clauses renumbered following above change.	Noted.
3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data	Insert new clause: (c) Each *MDP* must operate and maintain a process so that on the next *business day* after which a period of, at most, five consecutive *business days* where remote acquisition is unavailable, the *MDP* must notify the *MC* that *remote acquisition* is unavailable.	AGL supports the change.

3. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)

Section	Description	Participant Comments
12.2 Metering Data Collection	Insert new clauses: (k) When the MC is informed of a metering data collection issue, the MC must: (i) within 15 business days, take the necessary steps to have the missing metering data collected; (ii) ensure that the metering installations' communications interface is maintained to facilitate ongoing collection of metering data; (iii) ensure that metering data is collected at a frequency that is within the energy data storage capacity of that metering installation such that the metering data collection process prevents the loss of actual metering data; and (iv) ensure that, irrespective of the energy storage capacity of the metering installation, the metering installation reading frequency must not exceed three months since the last actual read was undertaken.	AGL supports the change.

4. Guideline for Clarification of the National Measurement Act

Section	Description	Participant Comments
1.1	This is the Guideline for Clarification of the National Measurement Act made under clause ~~7.15~~ 7.16.8 of the NER (**Guideline**). … This version of the Guideline makes reference to those parts of the National Measurement Act that are currently in force. ~~For information, the Guideline also makes reference to aspects of Part IV of the Act, which is expected to come into force in the near future when changes to the National Trade Measurement Regulations are made.~~ Those aspects of the Act that are not currently in force appear in italics in this version of the Guideline.	AGL supports the change.
3.1; 3.2.1; 3.2.2; 3.3	Minor changes	AGL supports the change.
3.3	Regulation 5.6 in the National Trade Measurement Regulations 2009 exempts certain classes of electricity meters from ~~Part IV~~ section 4A of the Act. (The exemption was previously located in the National Measurement Regulations);~~ and~~	AGL supports the change.
5.1.2; 5.2; 5.2.1; 5.2.2; 5.2.4; 5.3	Minor changes	AGL supports the change.

6.1	*National Trade Measurement Regulations* 2009, Regulation 5.6, "Exempt utility meters": • For the definition of utility meter in subsection 3(1) of the Act, the following classes of meters are exempted from the operation of ~~Part IV~~ section 4A of the Act: (b) electricity meters installed before 1 January 2013; (ba) electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 750 MWh of energy per year;	AGL supports the change.
6.2; 7; 8.3; Appendix C	Minor changes	AGL supports the change.

5. MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS)

Section	Description	Participant Comments
9.1.4; 9.2.4; 9.3.4; 9.4.4; 12.2.4; 12.2.5; 12.3.4; 12.5.4	Removes obligation for LNSP and ENM to populate a Change Request with Connection Configuration.	AGL acknowledges that the proposed changes to the configuration field were to meet the requirements of ICF 37, which was to make the MP responsible for the field. However, the implementation of that change, by moving the connection information from the NMI to the Meter, has led to a high degree of complexity. This, in turn, has moved the proposed field a long way from the original intent, which was connection information at a NMI level. As such, we propose that the proposed change sought by ICF 37 be rejected, and that the field revert to the original proposal, which was connections at a NMI, with the data captured on the CATS_NMI_DATA table as currently specified, with the information relating to the supply at the NMI, not the premise, irrespective of existing metering. This would result in the 2nd character of this field being set to one of 1,2 or 3.
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	AGL does not support this change
10.1.4(d); 10.2.4(d); 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	AGL does not support this change
10.4.4(d); 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	AGL does not support this change

Section	Description	Participant Comments
15.1.4(d); 15.1.4(f)	Changes position of reference to Connection Configuration for AEMO from 15.1.4(d) to 15.1.4(f).	AGL does not support this change
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	AGL does not support this change

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

Section	Description	Participant Comments
4.1.4; 4.2.4; 4.3.4; 7.1.4; 7.1.5; 7.2.3; 7.3.4	Removes obligation for LNSP and ENM to populate a Change Request with Connection Configuration.	AGL acknowledges that the proposed changes to the configuration field were to meet the requirements of ICF 37, which was to make the MP responsible for the field. However, the implementation of that change, by moving the connection information from the NMI to the Meter, has led to a high degree of complexity. This, in turn, has moved the proposed field a long way from the original intent, which was connection information at a NMI level. As such, we propose that the proposed change sought by ICF 37 be rejected, and that the field revert to the original proposal, which was connections at a NMI, with the data captured on the CATS_NMI_DATA table as currently specified, with the information relating to the supply at the NMI, not the premise, irrespective of existing metering. This would result in the 2nd character of this field being set to one of 1,2 or 3.
5.2.4(d); 5.3.4(d); 5.4.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	AGL does not support this change
9.1.4(b)(i); 9.1.4(b)(iii)	Changes position of reference to Connection Configuration for AEMO from 9.1.4(b)(i) to 9.1.4(b)(iii).	AGL does not support this change

7. Standing Data for MSATS (Standing Data document)

Section	Description	Participant Comments
Table 6 (CATS_NMI_DATA)	Change location of ConnectionConfiguration field to Meter Register table.	AGL acknowledges that the proposed changes to the configuration field were to meet the requirements of ICF 37, which was to make the MP responsible for the field. However, the implementation of that change, by moving the connection information from the NMI to the Meter, has led to a high degree of complexity. This, in turn, has moved the proposed field a long way from the original intent, which was connection information at a NMI level. As such, we propose that the proposed change sought by ICF 37 be rejected, and that the field revert to the original proposal, which was connections at a NMI, with the data captured on the CATS_NMI_DATA table as currently specified, with the information relating to the supply at the NMI, not the premise, irrespective of existing metering. This would result in the 2nd character of this field being set to one of 1,2 or 3.

Section	Description	Participant Comments
Table 3 (CATS_METER_REGISTER)	ConnectionConfiguration field to be updated as follows: Two-character code to denote information about the configuration of the connection point. First Character = Connection Type H = *High voltage* (as defined in the NER) L = Low voltage (lower than the threshold defined for *high voltage* in the NER) Second Character A = single phase supply/single phase metering B = 2 phase supply/one phase with single phase meter C = 2 phase supply/two phases each with single phase metering D = 2 phase supply/ two phase metering E = 3 phase supply/one phase with single phase metering F = 3 phase supply/two phases each with single phase metering G = 3 phase supply/two phase metering H= 3 phase supply/three phases each with single phase metering J = 3 phase supply/three phase metering K = SWER MANDATORY where there is an installed meter Field to be provided by ~~LNSP~~ MPB	AGL does not consider that the proposed table is correct. Configurations such as C, F and H denote the configuration for multiple meters, which would never be used in a field associated with an individual meter. AGL acknowledges that the proposed changes to the configuration field were to meet the requirements of ICF 37, which was to make the MP responsible for the field. However, the implementation of that change, by moving the connection information from the NMI to the Meter, has led to a high degree of complexity. This, in turn, has moved the proposed field a long way from the original intent, which was connection information at a NMI level. As such, we propose that the proposed change sought by ICF 37 be rejected, and that the field revert to the original proposal, which was connections at a NMI, with the data captured on the CATS_NMI_DATA table as currently specified, with the information relating to the supply at the NMI, not the premise, irrespective of existing metering. This would result in the 2nd character of this field being set to one of 1,2 or 3.

8. Questions on proposed changes

Heading	Participant Comments
With regards to ICF_037 Connection Configuration, do you consider that the field would be better split to allow the LNSP to provide the expected supply connection to the site and the MPB to provide the supply at the metering level?	AGL acknowledges that the proposed changes to the configuration field were to meet the requirements of ICF 37, which was to make the MP responsible for the field. However, the implementation of that change, by moving the connection information from the NMI to the Meter, has led to a high degree of complexity. This, in turn, has moved the proposed field a long way from the original intent, which was connection information at a NMI level. As such, we propose that the proposed change sought by ICF 37 be rejected, and that the field revert to the original proposal, which was connections at a NMI, with the data captured on the CATS_NMI_DATA table as currently specified, with the information relating to the supply at the NMI, not the premise, irrespective of existing metering. This would result in the 2nd character of this field being set to one of 1,2 or 3.