

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services

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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. Service Level Procedure: Metering Data Provider Services (SLP: MDP Services)

Section	Description	Participant Comments
2.4.3 Reactive Energy	<p>Amend the wording to read:</p> <p>(a) Subject to paragraph (b), where the <i>metering installation</i> is configured to measure <i>reactive energy</i>, the MDP must store this <i>metering data</i> with the <i>metering data</i> in respect of <i>active energy</i> in the <i>metering data services database</i>.</p> <p>(b) The MDP is not subject to the storage requirement in paragraph (a), if the <i>metering data</i> in respect of <i>reactive energy</i> as measured by a type 4 <i>metering installation</i> is not required for the current purposes of either:</p> <p style="padding-left: 40px;">(i) provision to a requesting party, as may be required for the purposes of additional services under NER 7.4.3; or</p> <p>application of a <i>reactive energy</i>-based tariff.</p>	<p>Agreed, however AusNet Services would like type 5 and VICAMI meters to be included in paragraph (b), as such AusNet Services proposes the following amendment:</p> <p style="padding-left: 40px;">(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, type 5 or VICAMI metering installation is not required for the current purposes of either:</p>
New clause 2.4.1(a)(ix)	<p>Insert new clause:</p> <p><u>Ensure that systems and processes are in place to detect energy data, at least every 20 business days, when the datastream is not</u></p>	<p>AusNet Services does not support the proposal to introduce an additional process for the MDP to detect energy data every 20 business days, when the datastream is not active for remotely read</p>

Section	Description	Participant Comments
	<p>active for a metering installation with remote acquisition.</p>	<p>metering installations. Processes that were introduced as a part of the VICAMI roll out are more than sufficient in regard to avoiding metering data loss, as such AusNet Services proposes the following amendment:</p> <p>Where the Metering Coordinator (MC) is not the Distribution Network Service Provider (DNSP), 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</p>
Renumbered clauses	Clauses renumbered following above change.	Agreed.
3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data	<p>Insert new clause:</p> <p>(c) Each MDP must operate and maintain a process so that by the fifth consecutive day that remote acquisition is unavailable the MDP notifies the MC.</p>	<p>AusNet Services does not support the proposal to introduce an additional process for the MDP to notify the MC where remote acquisition is unavailable. Processes that were introduced as a part of the VICAMI roll out are more than sufficient in regard to avoiding metering data loss, as such AusNet Services proposes the following amendment:</p> <p>(c) Where the Metering Coordinator (MC) is not the Distribution Network Service Provider (DNSP), each MDP must operate and maintain a process so that by the fifth consecutive day that remote acquisition is unavailable the MDP notifies the MC.</p>

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

Section	Description	Participant Comments
<p>12.2 Metering Data Collection</p>	<p>Insert new clauses:</p> <p><u>(k) The MC must use reasonable endeavours to identify if a metering installation malfunction exists within 7 days from when an MDP informs them that remote acquisition is not available.</u></p> <p><u>(l) For metering installations that have remote acquisition, the MC must use reasonable endeavours to collect metering data at a frequency that prevents the loss of actual metering data but at a frequency of no more than 14 days since the last actual metering data was collected when remote acquisition is not available.</u></p>	<p>AusNet Services does not support the proposal for the MDP to inform the MC of a metering installation malfunction within 7 days where the MC, MP and MDP are a single business such as in Victoria with VICAMI meters. As such AusNet Services proposes the following amendment:</p> <p><u>(k) Where the Metering Coordinator (MC) is not the Distribution Network Service Provider, the MC must use reasonable endeavours to identify if a metering installation malfunction exists within 7 days from when an MDP informs them that remote acquisition is not available.</u></p> <p>AusNet Services does not support the proposal to collect metering data from a remotely read metering installation every 14 days where the MC, MP and MDP are a single business such as in Victoria with VICAMI meters. As such AusNet Services proposes the following amendment:</p> <p><u>(l) For metering installations that have remote acquisition, where the Metering Coordinator (MC) is not the Distribution Network Service Provider (DNSP), the MC must use reasonable endeavours to collect metering data at a frequency that prevents the loss of actual metering data but at a frequency of no more than 14 days since the last actual metering data was collected when remote acquisition is not available.</u></p>

4. 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.	Agreed.
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	Agreed.
10.1.4(d) 10.2.4(d) 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	Agreed.
10.4.4(d) 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	Agreed.
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).	Agreed.

Section	Description	Participant Comments
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	Agreed.

5. Standing Data for MSATS (Standing Data document)

Section	Description	Participant Comments
Table 6 (CATS_N MI_DATA)	Change location of ConnectionConfiguration field to Meter Register table.	Agreed.
Table 3 (CATS_M ETER_REG ISTER)	ConnectionConfiguration field to be updated as follows: MANDATORY where there is an installed meter Field to be provided by LNSP MPB	Agreed.

6. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)

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).	Agreed.

	<p>...</p> <p>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.</p>	
<p>3.1</p> <p>3.2.1</p> <p>3.2.2</p> <p>3.3</p>	<p>Minor changes</p>	<p>Agreed.</p>
<p>3.3</p>	<p>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</p>	<p>Agreed.</p>
<p>5.1.2</p> <p>5.2</p> <p>5.2.1</p> <p>5.2.2</p> <p>5.2.4</p>	<p>Minor changes</p>	<p>Agreed.</p>

5.3		
6.1	<p><i>National Trade Measurement Regulations 2009, Regulation 5.6, "Exempt utility meters":</i></p> <ul style="list-style-type: none"> 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: <p>(a) electricity meters installed before 1 January 2013; electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 750 MWh of energy per year;</p>	<p>Agreed. However the marked up copy of the document does not have the list correctly labelled, i.e.</p> <p>(b) electricity meters installed before 1 January 2013;</p> <p>(ba) electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 750 MWh of energy per year;</p>
6.2 7 8.3 Appendix C	Minor changes	Agreed.

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

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

8. Questions on proposed changes

Heading	Participant Comments
<p>Do you support the proposals contained in this Issues Paper? If not, please specify areas in which your assessment differs (include ICF reference number), with supporting information.</p>	<p>AusNet Services does not support the following proposals:</p> <p>ICF_023 Process when remote collection of metering data fails.</p> <p>Section 3.2 of the Issues Paper identifies that this proposal should only apply to metering installations where the MC, MP and MDP are not a single business; “This proposal seeks to clarify which participant is obliged to prevent the loss of actual metering data, especially when the appointed Metering Coordinator (MC), Metering Provider (MP) or MDP for a metering installation is not a single business”.</p> <p>Therefore ICF_023 should not be applied to metering installations where the MC, MP and MDP are a single business under the Distribution Network Service Provider, such as VICAMI metering installations.</p> <p>VICAMI meters store ~200 days worth of metering data, resulting in very little to no metering data loss. Adding additional processes to placate shortcomings in the Power of Choice metering specifications will only add additional overhead to Victorian DNSPs where it is not required.</p> <p>Metering installations where the MC is the DNSP should be exempt from the ammendements made to the Metrology Procedure Part A and SLP MDP Services documents. This feedback has been provided in the specific sections above.</p>

Heading	Participant Comments
	<p>ICF_M001 Process to detect energy data</p> <p>Section 3.1 of the Issues Paper identifies that this proposal should only apply to contestable markets; “Accordingly, in the contestable market, AEMO does not believe that defining the details of a detection process would be inappropriate. The development of such a process would be up to each MDP to determine.”</p> <p>Therefore ICF_M001 should not be applied to non-consteable markets, such as Victorian small metering installations, specifically where the MC is the DNSP.</p> <p>Again, due to the higher storage specifications of VICAMI meters compared to the Power of Choice meter specifications, the possibility of metering data loss is significantly reduced. The introduction of a 20 business day detection process will add additional overhead where it is not required.</p> <p>Metering installations where the MC is the DNSP should be exempt from the ammendements made to the SLP MDP Services document. This feedback has been provided in the specific sections above.</p>
<p>Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?</p>	<p>N/A</p>
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	
<p>With regards to the ‘Redefinition of Connection Configuration’ proposal (ICF_037), what standing data fields should be presented in</p>	

Heading	Participant Comments
the C7 Report, to enhance the report's useability?	
Do you have any further questions or comments on the proposed changes?	
Please provide any feedback that closely relates to this consultation on the Procedures, but warrants further investigation. AEMO will review any such feedback after this consultation, in the context of another consultation, or the annual prioritisation process.	