RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

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***Submission Date**: 22/04/2021*

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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	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 *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 application of a *reactive energy*-based tariff.	

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*.	
Renumbered clauses	Clauses renumbered following above change.	
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 by the fifth consecutive day that *remote acquisition* is unavailable the *MDP* notifies the *MC*.	PLUS ES notes that an LNSP has 5 business days to update the status of a NMI in MSATS following a NMI De-energisation. The service provider for remote acquisition metering relies on the status of the NMI to investigate why communications from their meter have ceased. The proposed obligation is measured in days and the obligation for the LNSP to update MSATS, which the MDP has a dependency on, is in business days. This misalignment will result in efficient processes for the Service Provider. For example, using Easter this year as an example: A site was de-energised by the LNSP on Wed 31/3: • 5 business days would be Friday 9/4 • 5 days for the SP would be 5/4 (Easter Monday -Public Holiday) • 7 days would be Wed 7/4 and

Section	Description	Participant Comments
		• NMI Status may not be updated until Friday 9/4. The proposed obligation (5days) would require: • the MDP notifying potentially unnecessarily the MC about remote acquisition unavailability. • The MC/MPB to mitigate downstream impacts such as wasted truck visits, building additional monitoring/validation processes to allow to 5 business days from day 1 of no communications in case the NMI status changes, etc. Aligning the timeframes for both obligations would enable the SP to streamline and implement efficient processes. PLUS ES proposes the following wording for consideration: (c) Each *MDP* must operate and maintain a process so that after the fifth consecutive **business day** that *remote acquisition* is unavailable the *MDP* notifies the *MC* **on the following business day.** The above proposed amendment would continue to support the minimum storage capacity of meters – 35 days; that is, enable actual meter data to be manually collected before it is lost.

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) 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. (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.	PLUS ES does not support the proposed drafting of clauses (k) and (l), for the following reasons: **Clause (k):** The current wording has the following negative impacts: • Timeframes are in calendar days and not business days. Generally service provider requirements and agreement are outlined in business days. In the general course of the year, 7 days are 5 business days, which is a challenging timeframe for the MPB to meet their Retailer's* requirements let alone complete the scheduling and visit the site. The timeframes are even less where public holidays are involved. For example, Easter 2021- 1 Apr, the MC was notified, 7days would be 8 Apr and due to Public Holidays, that allows the MPB with 3 business days. *Some Retailers have requested that MPBs do not visit the metering installation site unless the MPB has received a B2B SO from them, irrespective of the reason for the site visit.

Section	Description	Participant Comments
		• The proposed timeframe is so short that in many cases, it would inefficiently force two visits to ensure compliance. The MPB can ascertain that a metering installation is malfunctioning by visiting the site to investigate. If the metering investigation determines that the metering installation needs to be replaced, the MPB would incur additional costs as a second visit to the site would be required to effect the meter exchange. The proposed timeframe is not sufficient to allow the MC/MPB to comply with regulatory obligations pertaining to interruptions of supply within the one site visit. PLUS ES propose that the timeframe and clause is flexible enough to allow the MC to drive efficient and cost-effective processes, i.e. one site visit where required to also replace metering installations. **Clause (l):** • Stipulating a 14-day maximum reading frequency does not, of itself, contribute to the objective of preventing loss of actual metering data. Instead, it only imposes a higher manual meter reading cost beyond which is required to comply with requirements of market settlement with actual data.

Section	Description	Participant Comments
		A service provider with predominantly remote read meters does not have the field force which the regulated MPB would have to specifically read Type 5/6 meters. Associated meter reading costs depends on the volume of meters to be read and the geographical location. Low volume of meters and greater travel distances will contribute to higher costs. Obligating an MC to manually read a remote acquisition within 14 days from the last actual read, when communications are unavailable, incurs a cost for which there is no correlating/proportional benefit. The MPB has visibility to the data storage capacity of their meter models therefore can determine the data storage capacity of the meter and in the vast majority of cases, it is well beyond 90 days of data, if not default to 200+ days of data. The first part of the obligation on the MC to ensure that the meter is read to prevent the loss of actual data would meet the obligation to prevent the loss of data. PLUS ES also support the requirement to have a consistent read of these meters which are not MRAM but cannot be remotely read. To mitigate the above impacts, PLUS ES recommends that this timeframe is aligned with manually read meter requirements and is amended to 3 months. To drive operational efficiencies and realise proportional industry benefits, whilst meeting the objective of

Section	Description	Participant Comments
		preventing the loss of actual data, PLUS ES supports the following amendments to the proposed clauses: • (k) When the MC is informed of that remote acquisition is unavailable, the MC must use reasonable endeavours: (i) within 15 business days, take the steps to have the missing data collected (ii) to have the metering installations communications system maintained to ensure ongoing data collection; and (iii) to ensure that metering data is collected at a frequency that is within the data storage capacity of that meter/s such that the data collection prevents the loss of actual metering data, (iv) to read the meter at a frequency of no more than 3 months since the last actual read was undertaken, irrespective of the meter memory capability Alternatively, at a minimum the clauses should be amended to read as follows: (k) The MC must use reasonable endeavours to identify if a metering installation malfunction exists within 15 business days from when an MDP informs them that remote acquisition is not available.

Section	Description	Participant Comments
		(l) For metering installations that have remote acquisition, the MC must use reasonable endeavours to collect metering data at a frequency that is within the meter's data storage capacity to prevent the loss of actual metering data, but at a frequency of no more than 3 months since the last actual read was undertaken when remote acquisition is not available.

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.	As per PLUS ES comments provided in Section 8.1 of this documents, PLUS ES does not support the Connection Configuration being moved from NMI to Meter level.
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	
10.1.4(d) 10.2.4(d) 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	As per PLUS ES comments provided in Section 8.1 of this documents, PLUS ES does not support the Connection Configuration being moved from NMI to Meter level.
10.4.4(d) 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	As per PLUS ES comments provided in Section 8.1 of this documents, PLUS ES does not support the Connection Configuration being moved from NMI to Meter level.

Section	Description	Participant Comments
		Hence, the MC could not provide or update those details in CRs pertaining to updates of metering installation details.
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).	As per PLUS ES comments provided in Section 8.1 of this documents, PLUS ES does not support the Connection Configuration being moved from NMI to Meter level.
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	As per PLUS ES comments provided in Section 8.1 of this documents, PLUS ES does not support the Connection Configuration being moved from NMI to Meter level.

5. 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.	As per PLUS ES comments provided in Section 8.1 of this documents, PLUS ES does not support the Connection Configuration being moved from NMI to Meter level.
Table 3 (CATS_METER_REGISTER)	ConnectionConfiguration field to be updated as follows: MANDATORY where there is an installed meter Field to be provided by ~~LNSP~~ MPB	As per PLUS ES comments provided in Section 8.1 of this documents, PLUS ES does not support the Connection Configuration being moved from NMI to Meter level.

Section	Description	Participant Comments
		Additionally, the value populated at Green field sites would deliver the most value to an MPB who needs to complete a metering installation as a new connection.

6. 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.	
3.1 3.2.1	Minor changes	

3.2.2 3.3		
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~~	
5.1.2 5.2 5.2.1 5.2.2 5.2.4 5.3	Minor changes	
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: (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;	

6.2 7 8.3 Appendix C	Minor changes	

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	

8. Questions on proposed changes

Heading	Participant Comments
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.	**ICF _037: Redefinition of 'Connection Configuration'** PLUS ES is supportive of the Connection Configuration but does not support it being populated at a meter level. The benefit to the MPB and the industry will be realised if it is at the NMI and maintained by the LNSP. The LNSP creates the NMI at the time that the supply characteristics are presented by the connection applicant. At this point, the LNSP is informed of

Heading	Participant Comments
	the proposed supply point voltage, supply point size (maximum demand or maximum current) and whether supply point is single phase or three phase. Furthermore they are accountable for the supply and their assets and would be best positioned to identify or be aware of any changes and update MSATS accordingly. This information is highly desirable and required by the MPB, especially on a Green field site, to determine the metering required for installation. If the voltage of the supply point is known, then key aspects of metering – such as whether high voltage or low voltage metering is required – can be efficiently anticipated and prepared for, with the avoidance of wasted visits. Similarly, if the supply was known to be 3-phase, then the appropriate metering equipment required could be anticipated. For example, a 3-phase supply to the site with 3 x 1-phase meters. If the 1-phase was recorded against each of the 3 meters, the MPB could not determine that the site has a 3-phase supply which would support a 3-phase meter. Hence allowing the MPB if they wish to replace the 3x1 phase meters with a 3-phase metering installation. Whilst it is also desirable to know the phase of the meter at the connection point, this information could be extrapolated from other available information such as the meter model. To achieve these benefits the above-mentioned fields should all be available via the C7 report and meter model mapping with respect to phase should be available to the industry participants. **ICF_023: Process when remote collection of metering data fails** PLUS ES has provided details in the Meteorology Part A & MDP SLP relevant section of this document.

Heading	Participant Comments
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?	As discussed in previous sections of this document.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	As discussed in previous sections of this document.
With regards to the 'Redefinition of Connection Configuration' proposal (ICF_037), what standing data fields should be presented in 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.	PLUS ES analysis of their meter population where remote acquisition has failed for a consecutive period determined: • appr 50% of the total volume has occurred due to the customer's site being de-energised and the status not been updated in MSATS. There are various reasons why the misalignment occurs. • appr 35%+ of the total volume have access issues (physical barrier to the meter or customer refusal) which would prevent the MPB reading the metering installation or replacing the meter. These meters are usually long term. Ultimately this means that the MPB is incurring costs which could have been otherwise avoided and more importantly utilising resources which could have been deployed on other installation work. The access issues also ensure that

Heading	Participant Comments
	the MC potentially has metering malfunctions which cannot be rectified until and if the access issues are resolved and substituted data being published to the Market. PLUS ES recommends that the following warrant further discussion/investigation: • the misaligned NMI statuses - to identify barriers/constraints which prevent or delay the update of MSATS and what measures if any could decrease these volumes • Access Issues – identification and visibility of physical barriers etc