RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: TasNetworks*

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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.	
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*.	

Section	Description	Participant Comments
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*.	

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.	

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.	
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.	
10.4.4(d) 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	
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).	

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

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.	
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	

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**).	

	… 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 3.2.2 3.3	Minor changes	
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	Minor changes	

5.3		
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.	With respect to ICF_037 'Connection Configuration', TasNetworks recommends to removal of this field altogether from being included in the MSDR. TasNetworks believes it provides no material value whether it is stored on the NMI Table or the Meter Register Table, and in affect may provide misinformation depending on how it is used and interpreted. For a new connection, the LNSP would typically be allocating the number of phases as installed by the electrical technician for the premises which would correspond to the supply phases intended to be provided to the Connection Point by the DNSP, thus providing no value to the MP in regards to identifying whether the metering is required to be single or multi phase, particularly where the field is needed to be populated on NMI Creation. The B2B Service Order Request field *SupplyPhases*, which is mandatory for respective SSW and MSW requests should provide sufficient information to both the DNSP and MP on the number of phases at the Connection Point, thus negating the need to introduce an additional field. Typically, HV installations would be treated as a 'negotiated' connection and would therefore be managed differently to the high volume LV connections, again potentially negating the need to identify either H or L in the new Connection Configuration field. High Voltage connections could continue to be communicated to the retailer and MP via other means, either via email, service requests, connection portals or the like.

Heading	Participant Comments
	Moving the details to the Meter Register Table could also provide a large amount of duplication of these details (e.g. 3 meters on a NMI could all be tagged as L1), as well as not provide an indication that a 3 phase supply is available/provided at the Connection Point. Again, not providing any significant value to participants. There may be a large number of installations that have multiple single phase meters installed where the supply to the premises is multi phase, which will not be evident to participants whatever table the field is stored in. The B2B Service Order Requests also provides the field of *MeteringRequired* which is mandatory for Install Meter and Exchange Meter which could provide sufficient information to the MP about what metering is required. *SpecialInstructions* can also be used to provide further information should it be necessary.
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?	By continuing with existing processes and not introducing the new Connection Configuration field will eliminate the need for cost and impost to be borne by industry participants (and ultimately customers) to implement the new field into their respective market systems. TasNetworks believes there may be little impact by not introducing this new field, and it will also remove the ambiguity associated with how the information is being interpreted. It may be necessary to undertake further benefits analysis with respect to the intent of this field before introducing a field that does not provide the desired outcome.

Heading	Participant Comments
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	
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.	