

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:** United Energy*

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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>(i) provision to a requesting party, as may be required for the</p>	<p>The electricity distribution industry is undergoing profound changes, the traditional flow of energy down from the Transmission network to end use customers is making way to bi-directional distribution within LV networks and across via HV from one LV network to another as the deployment of embedded generation increases, resulting in lower customer loads and increasing generation exports, resulting in peaks and troughs in network capacity and swings in voltages.</p> <p>Today our business has approximately 800,000 customers and ‘7,300’ of those are on NMIs classified as Large, i.e. consuming more than 160MWh. Traditionally, the contestable metering on those customers has been configured EBQK (i.e. 4 quadrant).</p> <p>Of those 7,300 Large customers, some 1,000 are Type 1 to 3 customers (i.e. EHV sub-transmission or HV distribution customers) on a mandatory KVA</p>

Section	Description	Participant Comments
	<p>purposes of additional services under NER 7.4.3; or</p> <p>application of a <i>reactive energy</i>-based tariff.</p>	<p>demand tariff. Of the remaining 6,300 Large low voltage Type 4 customers, <u>4,200</u> are not on KVA demand tariffs through ‘customer choice’.</p> <p>It is a requirement of the NER under chapter 7 that where a site has an embedded generation with the possibility of export, that a bi-directional meter be installed, that is not reliant on either a KVA tariff or provision to a ‘requesting party’.</p> <p>Equally, the impact of power factor and reactive energy flows by large customers on distribution network capacity is not reliant on, or limited to those customers being charged on a KVA demand tariff. KVA demand tariffs are simply a pricing and a price signalling strategy, and for the Large type 4 customers, a ‘customer choice’ is provided to select between an energy only, or a KVA demand tariff, but that doesn't mean that those Large Type 4 customers are not consuming significant KVA capacity of the network.</p> <p>For the bulk of Victorian Small customers, the Victorian distributors now have access to real time PQ data providing even more information to help the networks be managed better.</p> <p>The proposed changes would see a significant proportion of our Large customers (58%) likely move from EBQK to E datastreams as they are not on KVA demand tariffs, and would remain so unless we as a ‘requesting party’ requested each of the MC's for each of those NMIs to expand back</p>

Section	Description	Participant Comments
		<p>to EBQK or at least EQK in the absence of embedded generation.</p> <p>Each time the FRMP at those NMIs churned, there may also be a churn of MC and we would be constantly needing to monitor and re-issue requests for additional data.</p> <p>The AEMC is currently undertaking a review of the "Regulatory Framework for Metering Services", along with a review into 'LV Network System Security and Reliability'.</p> <p>It is clear that the provision of metering services in the market in the past has focused purely on the real energy requirements for the retail and generation elements of the industry and for the settlements process and in some cases resulted in the lack of consistent data to distributors. While we are seeing increasing proposals to monitor and manage DER and further monitoring of what is occurring on the network, yet the proposed changes will result in reduction of data from 58% of our largest customers.</p> <p>The AEMC review of metering services includes consideration of: 'Better network service: the information provided by smart meters could give DNSPs a better picture of holistic electricity consumption patterns and enable them to make more efficient network investment decisions. Additionally, demand management and other products mentioned above, if available, may be able to help reduce peak demand and defer or avoid expensive network augmentations. This would benefit all consumers</p>

Section	Description	Participant Comments
		<p>through lower network costs’.</p> <p>The efficient management of distribution networks requires more than just kWh information, that was a limitation of past metering equipment, not of current capability.</p> <p>While it is agreed that sending and storing 5 minute intervals of "zero" data is of no benefit to anyone, there are few Large customers with ‘zero’ reactive energy flows, and they have an effect on the efficient planning and management of network capacity. We strongly recommend that at least EQK should be mandatory on all Large classified NMIs and B required, as per the rules, where embedded generation occurs. However, given the small number of non-KVA demand customers we prefer a blanket rule that EBQK be standard for all Large classified NMIs (i.e. Type 1 to 4 metering installations over 160MWh).</p> <p>We do agree with the proposal in regards to Small Type 4 installations (below 160MWh), particularly as we in Victoria, access our PQ data from our own AMI meters outside the requirements of the NER as ‘Network Devices’ and do not need ‘B’ unless embedded generation or ‘Q&K’ unless a KVA demand tariff is in place.</p> <p>United Energy strongly recommend that the below amendments be incorporated so that this change only apply to type 4 metering, where the customer is classified as ‘Small’ and read as follows:</p>

Section	Description	Participant Comments
		<p><i>(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.</i></p> <p><i>(b) For all Large customers, a default configuration of EBQK will apply unless otherwise agreed by the relevant market participants.</i></p> <p><i>(c) 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 Small customer 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 (ii) application of a reactive energy-based tariff.</i></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 active for a metering installation with remote acquisition.</u></p>	
Renumbered clauses	Clauses renumbered following above	

Section	Description	Participant Comments
	change.	
3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data	Insert new clause: <u>(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.</u>	United Energy supports the proposed change but recommends that this be updated to five business days.

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

Section	Description	Participant Comments
12.2 Metering Data Collection	Insert new clauses: <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> <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>	Chapter 10 of the NER defines ‘Metering Installation Malfunction’ as: The full or partial failure of the metering installation in which the metering installation does not: (a) meet the requirements of schedule 7.4; or (b) record, or incorrectly records, energy data; or (c) allow, or provides for, collection of energy data; or (d) in the case of a small customer metering installation, meet the requirements of schedule 7.5. Small customer metering installations can malfunction and need replacement, often depending on the nature of the

Section	Description	Participant Comments
		<p>malfunction the meter will be not operating or recording any data and hence rushing to site in 15 days is futile.</p> <p>Additionally, most small customer installations have direct connected metering and for any meter replacement require prior written notification of a planned outage resulting in further or multiple site visits if this prescriptive approach is applied to the mass market.</p> <p>The failure of a wide area telecommunications network resulting in failure to collect energy data is clearly not a metering installation malfunction.</p> <p>While the NER requires remotely read meters to have a minimum of 35 days of onboard meter data storage capacity, most modern meters and particularly those installed as 'new and replacement' meters under the 5 Minute Settlements rule typically have far more data storage capacity.</p> <p>This is demonstrated by most type 4S meters being capable to be installed as type 4A meters and to sustain scheduled reads on a monthly or quarterly read cycle and certainly not requiring a 15 day cycle.</p> <p>Much of the mass market outside Victoria is still fitted with type 6 basic meters, delivering register reads every 90 days under quarterly read cycles, replacement of those with remotely read 5 minute interval meters does not reduce the inefficiency and high costs of multiple site visits.</p>

Section	Description	Participant Comments
		<p>The intent behind this ICF was to define a timeframe for determining if a metering installation malfunction exists <u>where the minimum interval energy data storage for a meter is 35 days</u>. Hence, it is far better to let the MC/MP assess the situation and the storage capacity of their meter fleet and send a metering technician to investigate and determine if a metering malfunction has occurred and if the installation needs repair or replacement as opposed to sending a special meter reader with no technical skills or capabilities to investigate, assess, repair or replace a meter.</p> <p>For the situations where the WAN telecommunications network is out, but the meter is operating correctly and has adequate meter memory storage capacity, the deployment of manual meter reading resources and their timing should be left to the MC and MP to manage and not be made prescriptive as proposed.</p> <p>For all other situations the priority is to send a metering technician with the skills to investigate and assess the situation, and if required perform a planned outage, repair, or manually read and replace the malfunctioning meter.</p> <p>It is reasonable to prescribe a minimum manual data collection period for metering installations for Large customers and subsequently this proposal should be limited to those large, type 4 customers.</p> <p>The proposal under the SLP for notification from the MDP to</p>

Section	Description	Participant Comments
		<p>MC of loss communication is supported as drafted but United Energy strongly recommends the proposal for the new Metrology Procedure Part A clauses to be updated as per the below:</p> <p>(k) For Large customer metering installations, 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.</p> <p>(l) For Large customer 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.</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.	
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_N MI_DATA)	Change location of ConnectionConfiguration field to Meter Register table.	
Table 3 (CATS_M ETER_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).	

	<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>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>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>	

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: <ul style="list-style-type: none"> (a) electricity meters <u>installed before 1 January 2013;</u> <u>electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 750 MWh of energy per year;</u> 	
6.2	Minor changes	
7		
8.3		
Appendix C		

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.	
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?	
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.	