

# RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Vector Metering

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## Table of Contents

1. Context .....	3
2. Service Level Procedure: Metering Data Provider Services (SLP: MDP Services).....	3
3. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A) .....	4
4. MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) .....	6
5. Standing Data for MSATS (Standing Data document) .....	7
6. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework) .....	8
7. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS) .....	10
8. Questions on proposed changes .....	11

## 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
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>	The number of days should be in <i>Business days</i> . A common reason for losing communications is the NMI has been Deenergised by the LNSP. LNSP’s have 5 business days to update MSATS. MDP’s check NMI Status before initiating processes to resolve any comms issue. Requiring the MDP to commence these processes before MSAT’s is updated to reflect what has occurred is inefficient. Original ICF suggested 7 Business Days which also accounts for the inherent lag in receiving MSATS updates after DNSP has generated the CR transaction and the market is notified. Recommend the period be set to 7 business days.

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

Section	Description	Participant Comments
12.2 Metering Data Collection	<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>Proposed clauses are not practical and will introduce unnecessary cost on participants with little benefit.</p> <p>Focus should be on ensuring that data is not lost from a meter that cannot communicate and that the manual collection frequency is reasonable. Suggest proposed clauses be replaced with...</p> <ul style="list-style-type: none"> <li>(k) When the MC is informed of a meter data collection issue, the MC must use reasonable endeavours to:               <ul style="list-style-type: none"> <li>(i) within 15 business days, take the steps to have the missing data collected;</li> <li>(ii) have the metering installations communications system maintained to ensure ongoing data collection; and</li> <li>(iii) 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</li> </ul> </li> </ul>

Section	Description	Participant Comments
		metering data,  (iv) 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

#### 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.	Do not support that the MPB should be made responsible for this information. This field represents the supply to a premise, which is part of the LV infrastructure that LNSP's and ENM's manage. LNSP's and ENM's have access to this information (max demand) as Customers must provide this before the supply is established or upgraded. The LNSP and ENM can use this information to decide if they need to upgrade other parts of the network and this can be used to update Connection Configuration in MSATS.
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	ConnectionConfiguration should remain at NMI level and not at the Meter level. CI9.3.4.c should be reinstated for this field and CI9.3.4(h) should remove ConnectionConfiguration as field to be added to each meter.
9.4.4(h)	Allows ENM to populate the Change Request with Connection Configuration information	ConnectionConfiguration should remain at NMI level and not at the Meter level. CI9.4.4.c should be reinstated for this field.
10.1.4(d) 10.2.4(d) 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	While we support Connection Configuration information being collected, as was agreed in the MSDR process, we do not support the MPB being made responsible for maintaining this information. LNSP's are advised of the connection characteristics when the customer applies for a permission to connect. Customers must provide Max Demand information which drives the infrastructure that is deployed by the DNSP or the DNSP's agent (ASP in NSW). This infrastructure is considered part of the LV network and

Section	Description	Participant Comments
		<p>its maintained by the LNSP. This is the role that should be responsible for updating the characteristics in MSATS.</p> <p>As ConnectionConfiguration relates to the Connection Point it is appropriate that it remains on CATS_NMI_DATA table.</p>
10.4.4(d) 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	As above. LNSP should remain responsible for maintaining this information. Do not support this change.
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).	Do not support move Connectionconfiguration to the meter level (see below). This attribute reflects the supply line which is a attribute of the connectionpoint and is part of the LV infrastructure, not a particular meter.
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	Do not support move Connectionconfiguration to the meter level (see below). This attribute reflects the supply line which is a attribute of the connectionpoint, not a particular meter.

## 5. Standing Data for MSATS (Standing Data document)

Section	Description	Participant Comments
Table 6 (CATS_N	Change location of ConnectionConfiguration field to Meter Register table.	We do not support moving the ConnectionConfiguration field to the CATS_METER_REGISTER. This element should reside on the CAT_NMI_DATA entity as it is attribute of the connection point ( NMI) and not of any particular

Section	Description	Participant Comments
MI_DATA)		meter.  Placing ConnectionConfiguration field on the CATS_METER_REGISTER means it is an attribute of a particular meter and each meter on the NMI could have a different value. For ConnectionConfiguration to be useful it must reflect whether the supply is single, two or three phase <u>regardless</u> of the metering in place. LNSP's have this information available to them as customers are required to provide it upon requesting a supply establishment or upgrade.
Table 3 (CATS_METER_REGISTER)	ConnectionConfiguration field to be updated as follows:  MANDATORY <a href="#">where there is an installed meter</a>  Field to be provided by LNSP <a href="#">MPB</a>	We do not support moving the ConnectionConfiguration field to the CATS_METER_REGISTER. This element should reside on the CAT_NMI_DATA entity as it is attribute of the connection point ( NMI) and not of any particular meter.

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

## 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 <del>7.15</del> <a href="#">7.16.8</a> of the NER ( <b>Guideline</b> ).	This changes are not in the “Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)” but are in the GUIDELINE FOR CLARIFICATION OF THE NATIONAL MEASUREMENT



	<p>...</p> <p>This version of the Guideline makes reference to those parts of the National Measurement Act that are currently in force. <del>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.</del> Those aspects of the Act that are not currently in force appear in italics in this version of the Guideline.</p>	ACT . Confused me for a while..
<p>3.1</p> <p>3.2.1</p> <p>3.2.2</p> <p>3.3</p>	Minor changes	-
3.3	<p>Regulation 5.6 in the National Trade Measurement Regulations 2009 exempts <a href="#">certain classes of</a> electricity meters from <del>Part IV</del> <a href="#">section 4A</a> of the Act. (The exemption was previously located in the National Measurement Regulations); <del>and</del></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>	Minor changes	-

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"> <li>For the definition of utility meter in subsection 3(1) of the Act, the following classes of meters are exempted from the operation of <del>Part IV section 4A</del> of the Act: <ul style="list-style-type: none"> <li>(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></li> </ul> </li> </ul>	-
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
<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>Do not support following changes.</p> <ol style="list-style-type: none"> <li>1) Changes to obligations related to reading non-commed meters. - Requiring the MDP to attend a site to read a non-commed meter every 14 days is impractical with no benefit and is contrary to the NEO. Obligations should focus on ensuring that meter data is not lost as a result of meter memory capacity, and introduce a practical manual reading frequency that is considerate of the costs i.e. aligned with existing obligations for a manually read meter.</li> <li>2) Do not support change to obligations that make MPB responsible for providing Connection Configuration information as this relates to the supply line that is considered part of the LV network. This should remain on CATS_NMI_DATA for the LNSP to maintain. LNSP's have access to this information as customers are required to provide it as part of their connection applications. LNSP establish the supply line so they know whether they installed a single, 2 phase or 3 phase supply, Low Voltage or High Voltage supply. In jurisdictions where the supply is established by a third party (NSW) there are obligations on service providers to provide paperwork (CCEW) which will advise NSW LNSP's of the supply characteristics. LNSP's can use this to update MSATs. In the unlikely situation that LNSP's do not have this information then this could be provided by the B2B NOMW process. This is preferable</li> </ol>

Heading	Participant Comments
	to changing the CATS transactions and MSATS data model.
<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>1) Reading of non-comm'd meters – Support the principle that non-comm'd meters should be regularly read so that data is not lost but at a frequency that is practical. i.e. ensure that data is not lost, and read every quarter at a minimum .</p> <p>Pros – lost data will be avoided, additional costs for reading will be minimised.</p> <p>Cons – None.</p> <p>2) Connectconfiguration – LNSP should remain responsible. They have the data available via their BAU processes e.g. application forms, CCEW etc,</p> <p>Pros –Existing Transactions can be modified to update ConnectionConfiguration in MSATS, Field can remain on CATS_NMI_DATA, as it should. Confusion about meaning of ConnectionConfiguration can be avoided. I.e. does it relate to a meter or to the connection.</p> <p>Cons- None</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</p>	<p>All new data collected by the MSDR obligations should be made available to</p>

<b>Heading</b>	<b>Participant Comments</b>
<p>fields should be presented in the C7 Report, to enhance the report's useability?</p>	<p>the new participant in the c7 report. This included the details captured in the connection configuration field. Unclear where the fields returned in the C7 are documented in the procedures but recommend that a reconciliation of the C7 report fields and the MSATS fields is performed to ensure all relevant data is returned when a C7 report is requested. We note that problems exist today when the address details are not returned in some circumstances. This causes material issues for meter providers espically as metering installation timeframe obligation now exist. This is should also be addressed.</p>
<p>Do you have any further questions or comments on the proposed changes?</p>	<p>No.</p>
<p>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.</p>	<p>Nil.</p>