

UNMETERED LOAD GUIDELINE – DRAFT DETERMINATION AND REPORT

PREPARED BY: Retail Markets and Metering

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DRAFT DETERMINATION

Table of Contents

NOTICE OF SECOND STAGE OF RULES CONSULTATION	ii
1. BACKGROUND	4
1.1 Matter under consultation	4
1.2 The consultation and decision-making process	4
2. CONSIDERATION OF SUBMISSIONS	5
2.1 List of submissions received	5
2.2 Meetings and forums	5
3. MATERIAL ISSUES RAISED BY CONSULTED PERSONS	5
4. DETERMINATION	5
APPENDIX 1 – ISSUES AND COMMENTS RELATED TO CONSULTATION SUBJECT MATTER	6
ATTACHMENT 1 – COPY THE NOTICE OF FIRST STAGE OF RULES CONSULTATION	10

NOTICE OF SECOND STAGE OF RULES CONSULTATION

INTRODUCTION OF SMALL GENERATION AGGREGATOR FRAMEWORK – AMENDMENT TO THE METROLOGY PROCEDURE

This Notice of Second State of Rules Consultation informs all Consulted Persons of the second stage of consultation on the Unmetered Load Guideline.

The consultation is being conducted under clause 14.2.4(f) of the Metrology Procedure: Part B in accordance with the *Rules consultation procedures* in clause 8.9 of the *Rules*.

Date of notice

This Notice of Second Stage of Rules Consultation was issued on *14 February 2014*

First Stage of Consultation

AEMO issued the Notice of First Stage of Rules Consultation on *28 November 2013*, together with a draft guideline. Closing date for submissions to the First Stage of Consultation was *17 January 2014*.

Four submissions were received. All non-confidential submissions have been published on the *AEMO* website.

There were no requests for meetings.

AEMO has considered the issues raised in the submissions and has now produced a Draft Determination and Report.

The Draft Determination and Report is now available to all Consulted Persons for their consideration.

Matter under consultation

This consultation on the initial version of the Unmetered Load Guideline is being conducted under clause 14.2.4(f) of Metrology Procedure: Part B and in accordance with the National Electricity Rules (Rules) consultation procedures, detailed in clause 8.9 of the Rules.

The consultation process

The following table contains an outline of the remaining consultation process, including key dates. Please note that some of these dates are proposed dates and may be subject to change by *AEMO*.

PROCESS	DATE
Closing date for submissions received in response to this Notice of Second Stage of Rules Consultation	3 March 2014

Invitation to make submissions

AEMO invites submissions on the Draft Determination and Report on the Unmetered Load Guideline.

Comments are also invited on any other issues relating to the subject matter of the consultation.

Submissions should identify any information considered to be confidential and reasons why information is to be treated as confidential should be provided. *AEMO* reserves the right to publish material that it does not consider to be confidential, despite a submission stating so.

It should also be noted that material identified as confidential may be accorded less weight in the decision-making process than material that is published.

Closing date for submissions

Submissions in response to this Notice of Second Stage of Rules Consultation should reach *AEMO* by **5:00pm EST on 3 March 2014**.

AEMO has discretion to consider late submissions. Any late submission should explain:

- the reason for the lateness; and
- the detriment to you if *AEMO* fails to consider your submission.

Contact details

AEMO prefers that submissions be forwarded in electronic format (both pdf and Word) as they will be published on the *AEMO* website.

Please send all e-mail submissions to David Ripper, Senior Metrology Engineer,
david.ripper@aemo.com.au.

Date of Second Stage Rule Consultation publication: *14 February 2014*.

1. Background

1.1 Matter under consultation

This consultation on the initial version of the Guideline is being conducted under clause 14.2.4(f) of Metrology Procedure: Part B and in accordance with the National Electricity Rules (Rules) consultation procedures, detailed in clause 8.9 of the Rules.

The objectives of this consultation are to:

- Develop and publish a guideline in accordance with clause 14.2.4(f) of Metrology Procedure: Part B; and
- Ensure that Consulted Persons are properly informed about the proposed and final outcome.

1.2 The consultation and decision-making process

The following table provides an outline of the consultation process to date:

PROCESS	DATE
Notice of First Stage of Rules Consultation issued	28 November 2013 Completed
Closing date for submissions received in response to the Notice of First Stage of Rules Consultation	17 January 2014 Completed
Publication of this Draft Determination and issue of Notice Of Second Stage of Rules Consultation inviting submissions in response to the Draft Determination	14 February 2014

AEMO issued a Notice of First Stage of Rules Consultation on 28 November 2013 (**First Stage Notice**). A copy of the First Stage Notice is contained in **Attachment 1**. The First Stage Notice invited submissions by 17 January 2013. Four submissions were received and there were no meetings held.

AEMO also published a draft of the Unmetered Load Guideline.

The table below lists the remainder of the steps in the consultation process, together with the proposed dates for their completion. Please note that the proposed dates are subject to change by AEMO.

PROCESS	DATE
Closing date for submissions received in response to this Draft Determination	3 March 2014
Publication of the Final Determination	Currently, proposed date is 10 April 2014

2. Consideration of Submissions

2.1 List of submissions received

AEMO received four submissions in response to the First Stage Notice.

The following table contains a list of respondents:

RESPONDENT	PARTICIPANT TYPE OR OTHER ROLE
<i>ActewAGL</i>	<i>Distributor</i>
<i>Ausgrid</i>	<i>Distributor</i>
<i>Energex</i>	<i>Distributor</i>
<i>Steve Wise</i>	<i>Private submission</i>

All submissions were published on AEMO's website on the same date that this Draft Determination and Report was released.

Appendix 1 details the proposed changes to Unmetered Load Guideline, for each Consulted Person, each issue raised and, for issues AEMO considers to be non-material, AEMO's response.

2.2 Meetings and forums

There were no requests for meetings and no forums were held.

3. Material issues raised by Consulted Persons

There were no material issues raised by Respondents as the purpose of this consultation is to develop the Unmetered Load Guideline. AEMO, in consultation with the Metrology Reference Group (MRG), developed the Draft Determination outcomes detailed in Appendix 1.

4. Determination

Under clause 14.2.4(f) of Metrology Procedure: Part B, AEMO determines that, in AEMO's opinion, the Unmetered Load Guideline for the determination of a *load table* device *load* or annual *energy* consumption has been developed.

Appendix 1 – Issues and Comments Related to Consultation Subject Matter

ITEM	ISSUES/COMMENT	PROPOSED TEXT	DRAFT DETERMINATION
ActewAGL Energex	Comments related to consultation subject matter	ActewAGL – ActewAGL has no comments in relation to AEMO’s “Unmetered Load Guideline - Determination of Device Load and Annual Energy Consumption for Unmetered Device Types” Energex – Energex has no issues with the proposed changes	AEMO notes that respondents supported this proposal.
Ausgrid General – Introduction	This document assumes a level of knowledge of the NEM particularly around what is and is not market load. We believe the general audience to be a consultant or customer and therefore limited knowledge of type 7 metering. This document assumes they know the steps that occur prior to it getting to AEMO.	Provide a better introduction, also see comments relating to clause 1.	The purpose of this guideline, as described in clause 2, is to only provide assistance in determining load values for devices that are to be listed in the NEM Load Table.
Ausgrid General	Leaves the possibility that the process is not standard and is still reliant on each LNSP/RPs process for a new device or NMI application.		AEMO does not have a head of power to prescribe arrangements for off-market loads, therefore this guideline only addresses load value determination for type 7 loads.
Ausgrid General	Introduction of LED lighting. In the past there have been a limited number of wattage street lights, nominal wattages such as 80, 150, 250, 400 etc. LED streetlights are changing so rapidly that the product	Ausgrid would like to suggest AEMO considers bands of consumption such that an LED street light that falls within a particular wattage range for example 20 -	The processes related to assessing device load values and updating the NEM Load Table to include a new device will still be undertaken,

ITEM	ISSUES/COMMENT	PROPOSED TEXT	DRAFT DETERMINATION
	purchased and added to the load table today that is for example 29W will be 22W in a years time and then 20W in another 6 months. This would require the supplier of these products to continually make applications to the AEMO to update there product and potentially increase the size and complexity of the load table.	25W gets charged at 22.5W.	therefore the publication of the specific load values for devices is appropriate.
Ausgrid Clause 1	Provide a summary of Type 7 and franchise unmetered load up front to set the unmetered scene.	Provide a summary of Type 7 and franchise unmetered load up front to set the unmetered scene. In addition update flow chart for prior steps namely, one, decision to be made if they want it to be a market or non market load, then if market load include generic steps that occur before it reaches AEMO.	Summary of market unmetered loads included.
Ausgrid Clause 1	Expand the scope to include all unmetered loads or limit scope to Type 7 unmetered supplies only.		Scope of guideline limited to type 7 loads, in accordance with S7.2.3 Item 5(c) of the Rules.
Ausgrid Clause 3	It should be noted that, while <i>unmetered market load</i> devices (i.e. type 7 loads) appear in the <i>NEM load table</i> , the <i>unmetered loads</i> that are not included in the <i>NEM load table</i> are the subject of arrangements determined through consultation between LNSPs, FRMPs, interested parties and end-use customers.	Rather than FRMP should it be the LR as they are the only possible FRMP for these connections. It would be beneficial to give these 'franchise unmetered loads' a name so they can be easily identifiable when referring to them in the document.	Reference to LR included. Unmetered load types not included in NEM Load Table to be referred to as "off-market <i>unmetered loads</i> ".
Ausgrid Clause 3	Who are Approval Authorities? It is capitalised, does this make it a definition?	Approval Authorities is the Responsible Person?	Typical Approval Authorities included.

ITEM	ISSUES/COMMENT	PROPOSED TEXT	DRAFT DETERMINATION
Ausgrid Clauses 4&5	These should be moved to the start of the document.		Clauses 4, 5 and 6 become clauses 3, 4 and 5 respectively and clause 3 becomes clause 6.
Steve Wise 6	For readability, the seven points under the first paragraph should be bullet pointed or numbered in some way.	Reformat the points.	Points alphabetically labelled.
Steve Wise 7, point 6	The last paragraph of this section establishes (or at least implies) a threshold of 10 that negates the achievement of a 95% confidence level for larger populations.	A sample size less than that required by achieve the required confidence level and precision may be allowed where the proponent can provide reports or other evidence from manufacturers etc. to substantiate the use of smaller sample sizes.	Original intention was that smaller samples were to also support 95% confidence level and 2% precision. Wording revised to clarify this intent.
Ausgrid Clause 9	Typo Watt.hours	Remove full stop between Watt and hours	Correction made.
Ausgrid Clause 10	In this clause AEMO touches on the inventory table.	Suggest a clause on the preparation and maintenance of inventory tables and associated responsibilities.	Clause 10 describes the potential impact on settlements and customer billing if a device is re-configured electrically and the load value is not changed. Clause 10 does not mention Inventory Table. Clauses 14.3.3 and 14.4.3 of Metrology Procedure: Part B provide details of preparation and maintenance

ITEM	ISSUES/COMMENT	PROPOSED TEXT	DRAFT DETERMINATION
			inventory tables and the associated responsibilities.
Steve Wise 12	<p>The use of the phrase “we can be 95% sure “ in this sentence: ‘Load test results should be based on device sample sizes where we can be 95% sure (confidence level) that the mean load value of the sample is within +/- 2% (precision) of the true mean load value for the device population.’</p> <p>The phrases used in point 6 of section 7 and in section 12 regarding load test results are quite different. Whatever form of words is used in these two sections should be consistent to the extent possible.</p>	<p>“Load test results are to be based on device sample sizes where a 95% assurance (confidence level) that the mean device <i>load</i> or annual <i>energy</i> consumption value of the sample is within +/- 2% (precision) of the true mean <i>load</i> or annual <i>energy</i> consumption value for the device population”.</p>	Wording changed to be consistent with 7, point 6.
Steve Wise 12	<p>The last paragraph of this section establishes (or at least implies) a threshold of 10 that negates the achievement of a 95% confidence level for larger populations.</p>	<p>A sample size less than that required by achieve the required confidence level and precision may be allowed where the proponent can provide reports or other evidence from manufacturers etc. to substantiate the use of smaller sample sizes.</p>	See response to 7, point 6 above.

Attachment 1 – Copy the Notice of First Stage of Rules Consultation

NEM - First Stage of Rules Consultation: Unmetered Load Guideline

The NEM load table consists of device load values or annual energy consumptions for devices that have been classified as market loads, as agreed between a Minister and AEMO, and can be used with unmetered market connection points within the NEM. These device load values are used in the algorithm that produces calculated metering data for unmetered market loads.

Under clause 14.2.4(f) of Metrology Procedure: Part B, AEMO must develop and publish a Guideline to provide industry with assistance in determining the device load or annual energy consumption of an unmetered device to support proposals to modify the NEM load table.

Matter Under Consultation.

This consultation on the initial version of the Guideline is being conducted under clause 14.2.4(f) of Metrology Procedure: Part B and in accordance with the National Electricity Rules (Rules) consultation procedures, detailed in clause 8.9 of the Rules.

The following documentation is provided for this First Stage of Consultation:

- Draft Unmetered Load Guideline
- Unmetered Load Guideline Participant Response Pack

The Consultation Process

The following table contains an outline of the consultation process, including key dates. Please note that these dates are proposed dates and may be subject to change by AEMO.

PROCESS	DATE
Closing date for submissions received in response to this Notice of First Stage of Rules Consultation	<i>17 January 2014</i>
Publication of the Draft Determination and Report and invitation to make submissions in response to the Draft Determination	Currently, proposed date is <i>14 February 2014</i>
Closing date for submissions received in response to the Draft Determination and Report	Currently, proposed date is <i>3 March 2014</i>
Publication of Final Determination and Report	Currently, proposed date is <i>10 April 2014</i>

Invitation to make Submissions

AEMO invites written submissions on the Unmetered Load Guideline.

Comments are also invited on any other issues relating to the subject matter of the consultation.

Submissions should identify any information considered to be confidential and reasons why information is to be treated as confidential should be provided. AEMO reserves the right to publish material that it does not consider to be confidential, despite a submission stating so.

It should also be noted that material identified as confidential may be accorded less weight in the decision-making process than material that is published.

Closing Date for Submissions

Submissions in response to this Notice of First Stage of Rules Consultation should reach AEMO by 5:00pm EST on 17 January 2014.

AEMO has discretion to consider late submissions. Any late submission should explain:

- the reason for the lateness; and
- the detriment if AEMO fails to consider your submission.

Meetings

A request for a meeting may be made in a submission. The reasons why such a meeting is necessary or desirable must be included in the submission.

Please note that details of matters discussed at a meeting may be made available to other Consulted Persons.

Contact Details

AEMO prefers that submissions be forwarded in electronic format (both pdf and Word) as they will be published on the AEMO website.

Please send all e-mail submissions to David Ripper, Senior Metrology Engineer,
david.ripper@aemo.com.au.

Date of First Stage Rule Consultation publication: 28 November 2013.