

# FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Aurora Energy

***Submission Date:*** 24<sup>th</sup> June 2019

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## 1. Context

This template is being provided to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the 'Five-Minute Settlement Metering Procedure Changes – Package 2' consultation.

The changes being proposed focuses on supporting the implementation of:

- The Five-Minute Settlement (5MS) Rule
- The Global Settlement (GS) Rule
- Changes to the delivery, format and content contained in the meter data files sent to AEMO.

## 2. Metrology Procedure: Part A

Section	Description	Participant Comments
12.3, 12.4, 12.7	Provisions for non-contestable unmetered loads	Aurora Energy has no comment
12.4	Removal of 'First Tier' references	Aurora Energy has no comment

## 3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2, 2.5, 3.2, 3.3.6, 3.3.8, 4.2, 4.3.3, 4.3.5, 4.3.6, 5.2.1, 5.2.6, 5.3.4, 5.3.6, 6.1, 6.2.4, 14.2.2, 14.3	Provisions for embedded network local retailers (ENLR)	Aurora Energy has no comment
6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4, 13.2.1, 13.3.1	Provisions for non-contestable unmetered loads	Aurora Energy has no comment
11.1.2, 11.1.3, 11.2.2, 11.2.3, 11.3.1, 11.3.2, 11.3.3, 11.4, 11.5, 12.3, 12.4	Removal of 'First Tier' and 'Second Tier' references	Aurora Energy has no comment
11.2.1	Removal of 'Local Retailer (LR)' references	Aurora Energy has no comment

Section	Description	Participant Comments
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	11.4 Should there not be a formula for 5 minute, the existing 15, 30 has been updated, but there is no inclusion for 5 minute - $-\sum(TI \text{ metering data for 30-minute metering installations in Profile Area})_y \times MLF_{yzy=1} \times DLF_y$
11.4, 12.3	Provisions for 'bulk supply'	Aurora Energy has no comment
12.4	Provisions for UFE (unaccounted for energy)	Aurora Energy has no comment

#### 4. Meter Data File Format (MDFF) Specification NEM12 & NEM13

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	Aurora Energy has no comment

#### 5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
1.3	Inclusion of the MDM File Format and Load Process document	Aurora Energy has no comment
3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3	Removal of 'First Tier' and 'Second Tier' references	Aurora Energy has no comment
3.2.14, 3.2.16, 9.5, 9.6, 9.7	Inclusion of five-minute provisions	Aurora Energy has no comment
3.2.15, 3.2.16	Provisions for 'bulk supply'	Aurora Energy has no comment
3.2.15, 3.2.16, 9.2, 9.3, 9.4, 9.5, 9.6, 9.8, 9.9, 9.10	Provisions for embedded network local retailers (ENLR)	Aurora Energy has no comment
3.2.16,	Removal of 'Local Retailer (LR)' references	Aurora Energy has no comment
6.3, 6.4	Removal of aseXML csv payload tag reference	Aurora Energy has no comment
9.5	Removal of MDM RM14 MDP Data Version Comparison report	Aurora Energy has no comment

9.6	Removal of MDM RM15 Multiple Versions report	Aurora Energy has no comment
9.9	Removal of MDM RM18 Electricity Interval Data report	Aurora Energy has no comment
Appendix A	Provisions for FTP and API delivery method	Aurora Energy has no comment

## 6. MSATS Procedures: MDM File Format and Load Process

Section	Description	Participant Comments
1.1, 2.2, 3.1, 3.3, 3.4, 3.5, 3.7, 3.9, 3.10, 5.2, 5.2.5, 6	Provisions for MDFF (Meter Data File Format)	Aurora Energy has no comment
1.3	Inclusion of additional 'Related Documents'	Unsure why aseXML Schema is referencing the GAS schema web page
3.6	Changes to table content	Aurora Energy has no comment
3.7, 3.8, 3.9, 3.12, 4.4.1	Removal of sections, including references to netting and aggregating to 30-minute	No reference to Q1,K1 which could be included in the file in table 4  Figure 4 is referenced twice for 2 different file types of read types both accumulation and interval

3.8, 5.1	Changes to MDMF content	Aurora Energy has no comment
3.11	Inclusion of file size references	I was unaware that the file size and number of transactions had been agreed, however Aurora Energy supports this statement
4	Inclusion of Meter data messaging exchange content	<p>Page 36</p> <ul style="list-style-type: none"> <li>• Event code 1090 represents the error ‘There is a record in the system that overlaps this record with a Version Date that is after the Version Date of this record.’</li> <li>• Event code 2002 [Actual MSATS event code TBA] represents the error ‘There is a record in the system that overlaps this record with a Version Date that is after the Version Date of this record.’</li> </ul> <p>These 2 codes seem to be advising the same thing – is the new event code still required?</p>
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	Aurora Energy has no comment

## 7. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
Quick Reference	Removal of Change Reason Code 1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003,	Aurora Energy has no comment

<p>Guide, 3.4, 3.7, 3.7.2, 4.2</p>	<p>4053, 5053, 5090, 5091, 6400, 6401</p>	
<p>Quick Reference Guide, 2.2, 2.6, 3.6, 4.2, 4.3, 4.15, 9.5, 12.8, 15.7, 16.7, 17.7, 18.8, 19.8, 20.7, 21.7, 22.7, 23.7, 25.9, 25.10, 27.7, 28.7, 30.7, 31.8, 32.7, 33, 34.7, 35.8, 36.9, 37.1, 37.5, 39.7</p>	<p>Provisions for embedded network local retailers (ENLR)</p>	<p>Table 9-B – Objection Rules – should LR be changed ENLR as the current LR can object</p> <p>12.4 ENM Requirements should the LR be changed to ENLR</p> <p>14.4 ENM Requirements should the LR be changed to ENLR</p> <p>Table 14-C Change LR to ENLR?</p> <p>25.4. LNSP Requirements (5001 only) – should LR be changed to ENLR</p> <p>25.5. ENM Requirements (5021 only) - should LR be changed to ENLR</p> <p>Table 411-D – CATS Standing Data Access Rules for Meter Register has reference to LR</p>
<p>2.9, 3.2, 4.11.2</p>	<p>Removal of ‘First Tier’ and ‘Second Tier’ references</p>	<p>Aurora Energy has no comment</p>
<p>3.2, 3.4, 4.15, 7.5, 11.4, 11.7, 11.8, 13.4, 13.6, 13.7, 25.9, 26.7,</p>	<p>Removal of Local Retailer (LR) references</p>	<p>LR Role still exists in various tables for example should the LR role not be populated with GLOPOOL</p> <p>In Change Requests where a LR is to be notified this will be the ENLR for a child NMI. –</p>

29.7, 33		<p>Table 41-D to 41-I– CATS Standing Data Access Rules has reference to allow LR to access particular data</p> <p>Table 41-K – Common NMI Standing Data items returned for an MC Standing Data Search- has reference to allow LR</p>
3.7.1, 3.7.2	Changes in table references	Aurora Energy has no comment
4.9	Addition to and modification of NMI Classification Codes	<p>SGA and DGENRATR are not in table</p> <p>If a Small or Large customer is reclassified to DHYBRID – the CATS procedures do not allow Churn unless Small or Large. How will a retailer be able to identify if the customer was Small or Large and what affect does this have on the NERR as they only cater for SMALL and LARGE NMI Classes</p> <p>None of the new classification codes for 1xxx,2XXX, 3XXX, 4XXX, 5XXX,6XXX are not permitted only Small or Large are considered – this is the same in the WIGS only WHOLESAL, INTERCON, GENERATR or SAMPLE are catered for.</p> <p>Page 60 note 8 Please note that “not SMALL” refers to LARGE, WHOLESAL, INTERCON, GENERATR or SAMPLE NMIs. Should include the new NMI classification codes</p>
4.12	Addition of ‘Non-contestable Unmetered Load’ Metering Installation Type Code	Table 4-L – Metering Installation Type Codes needs a manually read flag of Y or N
4.11.2, 4.17	Provisions for UFE (unaccounted for energy)	Aurora Energy has no comment

Various	Updated table and section references throughout the document	No mention of the new RM reports or the removal of RM9,11,21,27
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## 8. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
Quick Reference Guide, 23	Removal of Chane Reason Code 1050, 1051, 6400 and 6401	Aurora Energy has no comment
9.7, 10.7, 11.7, 12.7, 13.7, 14.7, 15.7, 18.7, 20.7, 21.9, 22.7, 23, 25.8, 26.7, 27.1, 28.1, 28.5	Provisions for embedded network local retailers (ENLR)	ENLR not changed in ,Table 3-C – Change Request Status Notification Rules,  6.1. Application [2020 2021] refers to the ENM must populate the LR should this not be the ENLR  Table 6-B – Objection Rules** has reference to LR & not ENLR
5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7	Removal of Local Retailer (LR) references	LR Role still exists in various tables e.g. Table 2-C – Objection Rules** , Table 2-D – Change Request Status Notification Rules** Table 4-B – Change Request Status Notification Rules** 5.4, Table 5-B – Objection Rules  for example should the LR role not have a statement that LR is considered GLOPOOL unless ENLR (this seems to be covered in the NMI document in

		<p>2.2)</p> <p>5.4. LNSP Requirements LNSP must: populate LR should this be may as per the CATS procedure?</p> <p>6.4. ENM Requirements ENM must: populate LR should this be may or must : ENLR</p> <p>7.4. LNSP Requirements LNSP must: populate LR should this be may as per the CATS procedure?</p> <p>Table 16-C – Change Request Status Notification Rules - LR* should this not be ENLR*</p>
Various	Updated table and section references throughout the document	None of the new classification codes for 1xxx,2XXX, 3XXX, 4XXX, 5XXX,6XXX are not permitted only Small or Large are considered – this is the same in the WIGS only WHOLESAL, INTERCON, GENERATR or SAMPLE are catered for.

## 9. National Metering Identifier

Section	Description	Participant Comments
2.2	Updates to LR population e.g. 'GLOPOOL'	<p>CATS procedure for 2001 indicates LNSP “may” not “must”</p> <p>3. NMI STRUCTURE - (g) (LR = POOL*) but no foot note for * but 7.2 shows LR = POOL* (where the “*” is a wildcard for the region)</p>

2.2	Provisions for embedded network local retailers (ENLR)	
2.4, 7	Provisions for non-contestable unmetered loads	2.4 (b) advises “One NMI is required for each non-contestable unmetered load” Some DB’s have advised they have multiple devises per single NMI  2.4 (e) A change of one attribute (FRMP, TNI, DLF, LNSP), or a change of End User, <b>will not of its own</b> require an abolition of the NMI. better wording
7, 9.3	Removal of net data and net datastream references	Aurora Energy has no comment
3, 7.2	Provisions for ‘bulk supply’	Aurora Energy has no comment
7, 9.3	Removal of meter data to AEMO requirements	Aurora Energy has no comment

## 10. NEM RoLR Processes – Part A

Section	Description	Participant Comments
2, 4.3.2, 6.1, 11.3, 12.3	Removal of Local Retailer (LR) references	Aurora Energy has no comment
2, 3, 6.1, 7.1, 11.2, 12, 13,	Provisions for embedded network local retailers (ENLR)	Aurora Energy has no comment

15.1, 18.2, Appendix 1		
6.1, 12	Removal of Second Tier references	Appendix 1 still refers to First and second tier NMI's
Appendix 1	Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report	Table still refers to First and second tier NMI's

## 11. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
1.3	Inclusion of additional related document	Aurora Energy has no comment
2.4.1	Inclusion of 5 February 2022 reference	Aurora Energy has no comment
3.7.1	References to MDM format and MDMT transaction groups	Should this not be 5 minute not aggregated to 30 minute as it discusses interval meter data.
3.10, 3.11, 3.12.2	Provisions for non-contestable unmetered loads	Aurora Energy has no comment
3.12.4	Provisions for MDPs to deliver AEMO all Datastreams related to settlements ready data and any other metering data configured in the metering installation to support UFE calculations	Aurora Energy has no comment

3.12.4	Changes to metering data quantity and quality requirements	Aurora Energy has no comment
3.12.5, 3.14.1, 3.14.2	Changes to method of delivery of data	Aurora Energy has no comment
5.1	Changes to meter churn scenio content, including the provision for having to send associated MDFFs to AEMO as well as to participants	Should this not say “to be sent to AEMO, and other relevant participants”

## 12. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
New Procedure		Aurora Energy has no comment

## 13. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
1.3	Inclusion of an addition related document	Aurora Energy has no comment
2.2, 2.7.7	References to the Exemption Procedure: Metering Installation Data Storage	Aurora Energy has no comment

	Requirements	
2.6.2	Inclusion of bulk supply and/or cross boundary references	Aurora Energy has no comment
5	Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms	Aurora Energy has no comment

## 14. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Implementing and transitioning to the changes in delivery of metering data to AEMO	Aurora Energy has no comment
<ul style="list-style-type: none"> <li>Do the proposed changes in the applicable initial draft change-marked procedures implement the required changes in section 2.2.5 in an effective manner?</li> </ul>	Aurora Energy opinion is yes
<ul style="list-style-type: none"> <li>Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new procedural requirements?</li> </ul>	Aurora Energy opinion is yes although the transition only really applies to the 1/7/2021 as participants will need to have most things in place prior to the 2022 dates

Heading	Participant Comments
<ul style="list-style-type: none"> <li>• Is including transitional arrangements in the relevant procedures the most effective way of implementing transitional arrangements? If not, what would be the preferred alternative approach?</li> </ul>	<p>Aurora Energy opinion is yes</p>
<p>Non-contestable Unmetered Loads</p>	<p>Aurora Energy has no comment</p>
<ul style="list-style-type: none"> <li>• How should non-market/contestable unmetered loads be processed and maintained in MSATS?                             <ul style="list-style-type: none"> <li>○ Should non-contestable unmetered loads with photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads and why?</li> <li>○ Should non-contestable unmetered loads which do not have</li> </ul> </li> </ul>	<p>Aurora Energy opinion is that both non-contestable unmetered loads with photoelectric (PE) cells and non-contestable unmetered loads which do not have photoelectric (PE) cells should be treated the same, if a non-contestable unmetered loads with photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads – a type 7 needs to have a consistent usage and any PE cells will vary depending on the weather conditions.</p>

Heading	Participant Comments
<p>photoelectric (PE) cells be treated differently to those that do? If yes, how should these loads be treated?</p>	
<ul style="list-style-type: none"> <li>• What should be considered in creating and assigning non-contestable unmetered NMIs in MSATS e.g. introducing a new Metering Installation Type Code (NCONUML) and why?</li> </ul>	<p>Aurora Energy agrees with the concept of new Metering Installation Type Code NCONUML but would also like to see a new meter type of type 8 to help identify the difference between UMS using type 7 metering</p>
<ul style="list-style-type: none"> <li>• What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why?</li> </ul>	<p>Aurora Energy has no comment</p>
<p>Service Levels for Meter Data Provider Services</p>	
<ul style="list-style-type: none"> <li>• Will AEMO's proposed arrangements likely result in more accurate market settlements and why?</li> </ul>	<p>Aurora Energy does not believe the proposed arrangements will result in a more accurate market settlement arrangement as AEMO will be only supplying TNI level data and not the underlying NMI level information making it difficult to accurately reconcile.</p>

Heading	Participant Comments
<ul style="list-style-type: none"> <li>What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements?</li> </ul>	<p>Aurora Energy believes AEMO should provide individual NMI information</p>
<p>Exemption Procedure: Metering Provider Data Storage Requirements</p>	
<ul style="list-style-type: none"> <li>Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process for applying for a data storage exemption and why?</li> </ul>	<p>Aurora Energy has no comment and believes this is a comment for MDP/MP's</p>