

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

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

*Participant: AusNet Services*

*Submission Date: 24 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	<p>In reference to section 12.3, AusNet Services is concerned the proposed procedures require the publishing of load tables and on/off tables for all unmetered loads. While this is appropriate for unmetered loads the distribution network service provider (DNSP) currently allows to be connected as unmetered, it is not appropriate for legacy connections with unmetered equipment that are no longer permitted to be unmetered. Publishing equipment in load tables creates the strong impression with customers that the DNSP would permit their proposed unmetered connection with such equipment.</p> <p>Also publishing load tables for unmetered devices no longer supported (i.e.</p>

Section	Description	Participant Comments
		<p>legacy non-contestable unmetered load) is unnecessary, because the agreed average daily demands (ADLs) are already transparent to the customer and retailer.</p> <p>Therefore, we recommend the following alterations to section 13.1.1.2.</p> <p>(b) The Load Tables, Inventory Tables and On/Off Tables for type 7 metering installations and noncontestable unmetered loads must be stored within the metering data services database, for all but legacy non-contestable unmetered loads.</p>

### 3. Metrology Procedure: Part B

Section	Description	Participant Comments
<p>6.1, 11.4, 12.3, 13.1.2, 13.1.3, 13.1.4, 13.2.1, 13.3.1</p>	<p>Provisions for non-contestable unmetered loads</p>	<p>In reference to section 13.1.2, AusNet Services is concerned the proposed procedures require the publishing of lists and load tables for all unmetered loads. While this is appropriate for unmetered loads the DNSP currently allows to be connected as unmetered, it is not appropriate for legacy connections with unmetered equipment that are no longer permitted to be unmetered. Publishing equipment in load tables creates the strong impression with customers that the DNSP would permit their proposed unmetered connection with such equipment.</p>

Section	Description	Participant Comments
		<p>Also publishing load tables for unmetered devices no longer supported (i.e. legacy non-contestable unmetered load) is unnecessary, because the agreed average daily demands (ADLs) are already transparent to the customer and retailer.</p> <p>Therefore, we recommend the following alterations to section 13.1.2.</p> <p>(b) LNSPs must publish a list of non-contestable unmetered loads and keep this list up to date, <b>for all but legacy non-contestable unmetered loads</b>.</p> <p>(c) LNSPs must publish a Load Table for non-contestable unmetered loads and keep this Load Table up to date, <b>for all but legacy non-contestable unmetered loads</b>.</p>
11.2.1	Removal of 'Local Retailer (LR)' references	
11.3.3, 11.4, 12.4, 13.2.5	Change in formulas	
11.4, 12.3	Provisions for 'bulk supply'	
12.4	Provisions for UFE (unaccounted for energy)	

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

Section	Description	Participant Comments
1.1	Include AEMO as a relevant party	Agree with proposed change

## 5. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
		No comments on the proposed MDM Procedures.

## 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)	AusNet Services agrees with provisions in section 5.2.1 that allow the MDPs to replace existing metering data records with new metering data records, as long as the 'UpdateTime' for the new data record must be greater than or equal to the 'UpdateTime' of the existing record. This avoids the cost and complexity of filtering which retailer requested metering data gets sent to AEMO.
3.11	Inclusion of file size references	We support the proposed file size upper limits.

4	Inclusion of Meter data messaging exchange content	
3.1, 3.3, 3.10, 3.12, 4.2	Provisions for FTP and API delivery method	

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

Section	Description	Participant Comments
4.9	Addition to and modification of NMI Classification Codes	<p>AusNet Services does not agree with the proposed inclusion of the DHYBRID NMI Classification Code and description. The proposed description's reference to significant bi-directional energy flows could include residential or small commercial batteries. This information should be captured in the DER register, and duplicating it in the CATS Procedures will create inefficiencies in managing this data in accordance with the customers' connection processes.</p> <p>Therefore, we recommend altering the description to specify the DHYBRID is to only apply for sites with greater than 5 MW capacity or are otherwise register generators or scheduled market loads.</p>

## 8. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
		No comments on the proposed MSATS Procedures: WIGS

### 9. National Metering Identifier

Section	Description	Participant Comments
2.4, 7	Provisions for non-contestable unmetered loads	<p>The proposed wording in section 2.4(f) of expecting “each LNSP has a procedure for the allocation of NMIs for non-contestable unmetered loads...” is poorly worded as an obligation and creates an overly bureaucratic oversight obligation on LNSPs and AEMO. Instead, we suggest:</p> <p>“Each LNSP must only allocate new NMIs for non-contestable unmetered loads in accordance with policies and procedures.”</p> <p>Then any regulatory authority could manage compliance through their normal compliance and enforcement framework.</p>

### 10. NEM RoLR Processes – Part A



Section	Description	Participant Comments
		No comments on the proposed NEM RoLR Procedures – Part A

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

Section	Description	Participant Comments
3.12.4	Changes to metering data quantity and quality requirements	<p>The proposed quality requirement of 100% at first revision (R1) is arbitrary and will have a perverse effect of making the market less accurate. The reason for this, is that MDPs struggling to remotely read meters with remote communication issues and/or no access issues would have to final substitute when they run out of time. It can often take 4-6 months to negotiate the necessary access arrangements with customers to collect actual metering data. Settlements would be made less accurate due to the anticipated increase in final substitutes provided by MDPS to meet the 100% quality obligation at R1.</p> <p>AusNet Services recommends retaining the quality requirement at first revision (R1) for remotely read meters to 98%, which provides some contingency to deal with exceptional issues across MDPs metering fleet.</p> <p>We support the remainder of the proposed MDP SLPs changes.</p>

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

Section	Description	Participant Comments
New Procedure		

## 13. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments

## 14. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
<p>Implementing and transitioning to the changes in delivery of metering data to AEMO</p> <ul style="list-style-type: none"> <li>Do the proposed changes in the applicable initial draft change-marked procedures implement the required</li> </ul>	<p>The proposed procedures are deficient in describing the changes that must occur for Global Settlements to wholesale NMI assignments by what day. Leaving this level of prescription to the currently drafted NMI Procedures is inadequate because the scope of the procedures is limited</p>

Heading	Participant Comments
<p>changes in section 2.2.5 in an effective manner?</p>	<p>to creating NMIs as contemplated in n clauses 7.8.2(d)(2), and 7.8.2(ea) (eb) &amp; (ec) of the National Electricity Rules. As drafted it only specifies what the requirements are for new NMIs not all NMIs.</p>
<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>	
<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>Including clear transitional arrangements is essential in managing the transition to 5 Minute Settlements and Global Settlements. These arrangements must be written in enforceable legal instruments and not guidelines that are not enforceable under the National Electricity Rules. Procedures must be very clear to say what all Registered Participants must do and by what day.</p>
<p>Non-contestable Unmetered Loads</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</li> </ul> </li> </ul>	<p>For predictable unmetered load, it is clear global settlements require all the unmetered load on each TNI to be accounted for in the market. In developing the requirements for accurate global settlements, it not essential to prescribe rules that require NMIs for each unmetered device or bundling. It is important, that DNSPs have discretion to assign individual NMIs to unmetered device or to bundle into a single NMI into logical groups based on the requirements of the Customer (for example a Council bundling multiple public BBQs). Similarly, DNSPs need discretion whether or not to apply light profiling to all lights with PE cells, in the same way as Type 7 metering. In the case of security lights (e.g. enclosed lights) with a combination of</p>

Heading	Participant Comments
<p>photoelectric (PE) cells be treated in a similar manner to Type 7 unmetered loads and why?</p> <ul style="list-style-type: none"> <li>○ Should non-contestable unmetered loads which do not have photoelectric (PE) cells be treated differently to those that do? If yes, how should these loads be treated?</li> </ul> <ul style="list-style-type: none"> <li>● What should be considered in creating and assigning non-contestable unmetered NMI in MSATS e.g. introducing a new Metering Installation Type Code (NCONUML) and why?</li> </ul>	<p>proximity sensors, timers and PE cells, this is not appropriate.</p> <p>For these reasons, AusNet Services recommends allowing DNSP the discretion to assign group NMIs or individual NMIs and the discretion to apply Type 7 profiling only when it is appropriate to do so and in accordance with the customers agreement.</p> <p>AusNet Services suggests that the relevant considerations when assigning NMIs to unmetered load is ensure:</p> <ul style="list-style-type: none"> <li>● The logical grouping is End User/TNI/FRMP/DLF/Substation, or an individual NMI is created;</li> <li>● The assignment to unmetered load is to continue an ongoing arrangement for a legacy site; or</li> <li>● For new sites whether the maximum demand is suitable for an unmetered load</li> </ul> <p>We support the establishment of the new Meter Install Type Codes and NMI Classification codes</p>

Heading	Participant Comments
<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>(except DHYBRID as currently described).</p> <p>In the experience of AusNet Services, the total amount of unmetered load consumption on our network is dwarfed by total losses due to non-technical losses (e.g. energy theft) and that is with our extensive programs to remotely detect and resolve non-technical loss issues. It is for this reason; unmetered loads need NOT be calculated with the most accurate methodology if the costs exceed the value of any potential inaccurate measurements, money is better spent resolving energy theft.</p> <p>Additionally, unless the turn-off and turn-on times are actually known it is more accurate to not guess the switching arrangements and apply the average consumption over all metering data intervals.</p> <p>Therefore, we recommend calculations based on “inventory Count” * “ADL” * “Days” with no essential requirements for On/Off times. The ADL would be calculated based on NATA test certificate (provided by the Customer’s representative) or sampled average consumption that provides an average usage patterns that vary from day to day in any case. This avoids unnecessary complexity and costs of multiple tables and formula required per UMS type. We disagree with current Metrology Procedure B proposal to make On/Off times mandatory.</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>The proposed quality requirement of 100% at first revision (R1) is arbitrary and will have a perverse effect of making the market less accurate. The reason for this is that MDPs struggling to remotely read meters with remote communication issues and/or no access issues would have to final substitute if and when they run out of time. It can often take 4-6 months to negotiate the necessary access arrangements with customers. Settlements will be made less accurate due to</p>

Heading	Participant Comments
	<p>increase in final substitutes to meet the 100% SLP obligation.</p> <p>AusNet Services recommends retaining the quality requirement at first revision (R1) for remotely read meters to 98%, which provides some contingency to deal with exceptional issues across MDPs metering fleet.</p> <p>We support the remainder of the proposed MDP SLPs changes.</p>
<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>Increasing second revision (R2) from 6 month settlement period to 8-9 months to align with retailer customer re-bill regulatory timeframe would make settlements more accurate by reducing the volume of final substituted metering data.</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>The proposed exemption procedure is substantially suitable for processing exemption applications.</p>