

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo Energy

Submission Date: 24/06/2019

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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>Red and Lumo accept the proposal for unmetered loads to be processed through MSATS.</p> <p>Under the current settlement by differencing regime, non-contestable unmetered loads are basically served by a local retailer and are thus effectively part of Unaccounted For Energy (UFE). However under global settlements, these non-contestable unmetered loads need to be accounted for in settlements and removed from UFE to avoid all retailers being charged for loads that the local retailer is already being paid for.</p> <p>We request that all unmetered loads are visible in MSATS.</p> |
| All | | <p>Red and Lumo note that the term non-contestable unmetered load is sometimes capitalised and other times not. Also, footer suggests that it commences on both 1 July 2021 and 6 February 2022. Please review and correct prior to issuing the next version.</p> |

3. Metrology Procedure: Part B

< Feedback to be provided at a later point >

| 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) | |
| 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 | |
| 11.1.2, 11.1.3, 11.2.2, 11.2.3, 11.3.1, 11.3.2, 11.3.3, | Removal of 'First Tier' and 'Second Tier' references | |

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| 11.4, 11.5, 12.3, 12.4 | | |
| 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 | <p>As per our comments to stage 1, we do not support AEMO receiving the same files as retailers and networks from MDPs. We consider that AEMO should only obtain what is required for settlements.</p> <p>Further, we recommend that an obligation be added that AEMO destroy all off-market data, that is not required for settlements, it receives in error. This should not be utilised by AEMO without the prior consent of the retailer and MDP.</p> |

5. MSATS Procedures: MDM Procedures

< Feedback to be provided at a later point >

| Section | Description | Participant Comments |
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| 1.3 | Inclusion of the MDM File Format and Load Process document | |
| 3.2.11, 3.2.14, 3.2.15, 3.2.16, 9.3 | Removal of 'First Tier' and 'Second Tier' references | |
| 3.2.14, 3.2.16, 9.5, 9.6, 9.7 | Inclusion of five-minute provisions | |
| 3.2.15, 3.2.16 | Provisions for 'bulk supply' | There is no definition for 'bulk supply'. Please include one in the glossary. Also, in the glossary, the term 'bulk supply' is supposed to only be used in the WIGS procedure, however the term is also used in the MDM. Please also update this in the glossary. |
| 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) | |
| 3.2.16, | Removal of 'Local Retailer (LR)' references | |
| 6.3, 6.4 | Removal of aseXML csv payload tag reference | |
| 9.5 | Removal of MDM RM14 MDP Data Version Comparison report | |
| 9.6 | Removal of MDM RM15 Multiple Versions report | |

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| 9.9 | Removal of MDM RM18 Electricity Interval Data report | |
| Appendix A | Provisions for FTP and API delivery method | |

6. MSATS Procedures: MDM File Format and Load Process

| Section | Description | Participant Comments |
|---------|-----------------------------------|--|
| All | | <p>General comment regarding the Procedure:</p> <p>As per our comments to stage 1, we do not support AEMO receiving the same files as retailers and networks from MDPs. We consider that AEMO should only obtain what is required for settlements.</p> <p>Further, we recommend that an obligation be added that AEMO destroy all off-market data it receives in error. This should not be utilised by AEMO without the prior consent of the retailer and MDP.</p> <p>Finally, in this document AEMO uses the terms “MDMT and MTRD” and “MDMT or MTRD” interchangeably. Red and Lumo recommend that AEMO review whether it is an ‘and’ or an ‘or’ in all circumstances across the process.</p> |
| 3.11 | Inclusion of file size references | Recommend that section 3.11 is removed. As this belongs in the technical specifications. Duplicating obligations in multiple procedures results in confusion if one is updated and not the other. |

7. MSATS Procedures: CATS Procedure Principles and Obligations

<Further commentary to follow on this Procedure>

| Section | Description | Participant Comments |
|--|--|----------------------|
| Quick Reference Guide, 3.4, 3.7, 3.7.2, 4.2 | Removal of Change Reason Code 1050, 1051, 1090, 1091, 2003, 3003, 3053, 4003, 4053, 5053, 5090, 5091, 6400, 6401 | |
| 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 | Provisions for embedded network local retailers (ENLR) | |
| 2.9, 3.2, 4.11.2 | Removal of 'First Tier' and 'Second Tier' references | |

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| <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, 29.7, 33</p> | <p>Removal of Local Retailer (LR) references</p> | <p>4.15. Change Request Status Notification Rules The Change Request Status Notification Rules define which Roles are to be advised when a Change Request undergoes a change in status. <u>In Change Requests where a LR is to be notified this will be the ENLR for a child NMI.</u></p> <p>The sentence added to 4.15 does not make sense. Does AEMO mean that where the CR has an LR it should apply the ENLR, but only for child NMIs? Or does it mean that where the NMI is a child NMI, the ENLR = the LR? Please clarify the intent of the obligation in your next round of drafting. This is particularly unclear when the tables continue to have LR except for 16-B, 17-B, 18-C, 19-C, 20-B, 21-B etc, and then 25-B has LR for one CR type and ENLR for another.</p> <p>In 11.4 and 13.4, wouldn't AEMO want the LNSP to populate the LR in all circumstances, so that it has the information available should a RoLR event occur. Irrespective of whether the LR receives data.</p> <p>In table 41-1D on standing data it is unclear why the LR can access: AddSiteInfo, MeterInstall Code, MeterPoint, MeterReadType, MeterSerial, MeterStatus and NextSchRead Date. If this is intended to apply to the ENLR, then update the heading in the table.</p> <p>In table 41-E, 41-F, 41-G, 41-H - the LR should only have access to those items in their FRMP capacity. If this is intended to apply to the ENLR, then update the heading in the table to state it.</p> |
| <p>3.7.1, 3.7.2</p> | <p>Changes in table references</p> | |

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| 4.9 | Addition to and modification of NMI Classification Codes | <p>In the additional codes: DHYBRID and THYBRID. What is the distinguishing feature of the NMI having “significant bi-directional energy flows”? Is significant 1KWh or 1TWh?</p> <p>Also, it is unclear where these are used. This has not been discussed in the SMS Procedure meetings to date.</p> <p>For XBOUNDRY - does this mean that AEMO will maintain TNIs and DLFs, assigning them to the relevant distributor? If AEMO is not undertaking this work, it should obligate a relevant participant to undertake it.</p> |
| 4.12 | Addition of ‘Non-contestable Unmetered Load’ Metering Installation Type Code | |
| 4.11.2, 4.17 | Provisions for UFE (unaccounted for energy) | |
| Various | Updated table and section references throughout the document | 3.3(b) has a section 0. Reference to be updated. |

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 Change Reason Code 1050, 1051, 6400 and 6401 | |
| 9.7, 10.7, 11.7, 12.7, 13.7, 14.7, | Provisions for embedded network local retailers (ENLR) | |

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| 15.7, 18.7, 20.7, 21.9, 22.7, 23, 25.8, 26.7, 27.1, 28.1, 28.5 | | |
| 5.7, 5.8, 7.6, 7.7, 16.9, 16.10, 17.7, 19.7, 24.7 | Removal of Local Retailer (LR) references | |
| Various | Updated table and section references throughout the document | |

9. National Metering Identifier

| Section | Description | Participant Comments |
|---------|--|--|
| 2.2 | Updates to LR population e.g. 'GLOPOOL' | |
| 2.2 | Provisions for embedded network local retailers (ENLR) | |
| 2.4, 7 | Provisions for non-contestable unmetered loads | |
| 7, 9.3 | Removal of net data and net datastream references | |
| 3, 7.2 | Provisions for 'bulk supply' | There is no definition for 'bulk supply'. Please include one in the glossary. Also, in the glossary, the term 'bulk supply' is supposed to only be used in |

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| | | the WIGS procedure, however the term is also used in the MDM. Please also update this in the glossary. |
| 7, 9.3 | Removal of meter data to AEMO requirements | Consistent with our submissions to package 1, we consider that AEMO should only receive net data streams. As such, we support retaining the provisions in these sections. Participants should, at a minimum, be able to choose whether their MDP provides net or export/import data to AEMO |

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 | <p>Given that Victoria has not applied the NERL or NERR, it is unclear whether AEMO should be removing all references to the LR becoming the ROLR in every clause. In Victoria, the LR = the ROLR.</p> <p>Should AEMO leave the struck out clauses, and state that they apply to VIC only?</p> <p>This also needs to be considered for the reports produced under Part B - it seems that the reports provided will sometimes refer to the LR and other times to the ENLR.</p> |
| 2, 3, 6.1, 7.1, 11.2, 12, 13, 15.1, 18.2, Appendix 1 | Provisions for embedded network local retailers (ENLR) | |
| 6.1, 12 | Removal of Second Tier references | |

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| Appendix 1 | Inclusion of Average Daily Loads (ADLs) in the ROLR_013 report | |
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11. Service Level Procedure: Metering Data Provider Services

| Section | Description | Participant Comments |
|--------------------|---|---|
| 1.3 | Inclusion of additional related document | |
| 2.4.1 | Inclusion of 5 February 2022 reference | |
| 3.7.1 | References to MDM format and MDMT transaction groups | |
| 3.10, 3.11, 3.12.2 | Provisions for non-contestable unmetered loads | |
| 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 | <p>Support the proposed upgrades to Section 3.12.4 (b) of the MDP Service Level Procedure which alters dates and periods of the Data Delivery calendar and changes the quantity and quality of settlements data.</p> <p>The updates are required as it will result in:</p> <ul style="list-style-type: none"> • Timelier and more accurate data which is required in the settlement process. • More accurate data being delivered to AEMO which will allow them to improve the accuracy of their allocation of UFE. This is particularly crucial with the transition to global settlements • More accurate data for over a quarter of the small customers in the NEM with remotely read interval meters. |
| 3.12.4 | Changes to metering data quantity and quality requirements | |

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| 3.12.5, 3.14.1, 3.14.2 | Changes to method of delivery of data | |
| 5.1 | Changes to meter churn scenario content, including the provision for having to send associated MDFFs to AEMO as well as to participants | |

12. Exemption Procedure: Metering Installation Data Storage Requirements

| Section | Description | Participant Comments |
|---------------|-------------|--|
| New Procedure | | <p>We support the establishment of a procedure by AEMO that sets out the requirement for a proposed exemption procedure from the Metering Provider data storage requirements for the metering installations set out in clause 7.8.2(a2). The proposal to restrict the exemption to the Metering Provider data storage requirements under the NER for the metering installations set out in clause 7.8.2 (a2) is consistent with the intention of the five minute settlement rule proposal.</p> <p>We note that there has already been an update to the AMI Orders to provide an overarching exemption to Victorian DNSPs for all AMI meters. If this is the reason why this new Procedure exists, we do not consider it relevant.</p> <p>At a NMI level, this information should be published in MSATS that the exemption exists and its relevant expiry date.</p> |

13. Retail Electricity Market Glossary and Framework

| Section | Description | Participant Comments |
|------------|---|----------------------|
| 1.3 | Inclusion of an addition related document | |
| 2.2, 2.7.7 | References to the Exemption Procedure: Metering Installation Data Storage Requirements | |
| 2.6.2 | Inclusion of bulk supply and/or cross boundary references | |
| 5 | Changes to terms including the addition of ENLR and UFE and modifications to first tier, second tier and FRMP related terms | |

14. Other Issues Related to Consultation Subject Matter

| Heading | Participant Comments |
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| Implementing and transitioning to the changes in delivery of metering data to AEMO | |
| <ul style="list-style-type: none"> Do the proposed changes in the applicable initial draft change-marked procedures implement the required | |

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| <p>changes in section 2.2.5 in an effective manner?</p> | |
| <ul style="list-style-type: none"> ● Will the proposed transitional arrangements assist MDPs and other market participants in transitioning to the new procedural requirements? | |
| <ul style="list-style-type: none"> ● 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? | <p>Red and Lumo are broadly supportive of the changes proposed by AEMO that are associated with the delivery of metering data to AEMO by MDPs.</p> <p>The procedures that enable the implementation of these changes include:</p> <ul style="list-style-type: none"> ● Service Level Procedure: Metering Data Provider Services ● Meter data File Format Specification NEM 12 & 13 ● MDM File Format and Load Process ● National Metering Identifier Procedure <p>We are comfortable with AEMO’s proposal to include transitional arrangements in the relevant procedures. This will allow MDPs to move to the new arrangements prior to that date, even though the proposed new delivery requirements are scheduled to come into effect on 1 July 2021.</p> |
| <p>Non-contestable Unmetered Loads</p> | |
| <ul style="list-style-type: none"> ● How should non-market/contestable unmetered loads be processed and maintained in MSATS? <ul style="list-style-type: none"> ○ Should non-contestable unmetered loads with photoelectric (PE) | <p>As noted above, we support all unmetered loads be added to MSATS to be visible to all participants.</p> |

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| <p>cells be treated in a similar manner to Type 7 unmetered loads and why?</p> <ul style="list-style-type: none"> ○ 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? | |
| <ul style="list-style-type: none"> ● 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? | <p>Why is AEMO only considering whether this new Metering Installation Type Code should be created and not ask about all the other NMI Classification Codes ones?</p> <p>What happens if a NMI has more than one NMI Classification Code? Can a NMI be SMALL and DHYBRID?</p> |
| <ul style="list-style-type: none"> ● What would be the most accurate methodology for calculating and applying a load profile to non-contestable unmetered loads and why? | |

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| Service Levels for Meter Data Provider Services | |
| <ul style="list-style-type: none"> • Will AEMO's proposed arrangements likely result in more accurate market settlements and why? | |
| <ul style="list-style-type: none"> • What other data quality mechanisms should AEMO consider to supporting improved accuracy in market settlements? | |
| Exemption Procedure: Metering Provider Data Storage Requirements | |
| <ul style="list-style-type: none"> • Do you believe that AEMO's proposed exemption procedure clearly articulates the conditions and process for applying for a data storage exemption and why? | |
| Other | <p>In our package 1 response, we queried how AEMO would manage the following as it receives for all energy and non-energy metering data. These have not been answered in package 2.</p> <ul style="list-style-type: none"> • How would additional data be stored? • Include provision of AEMO's responsibility to ensure obligations under the Privacy Act are met • What confidentiality requirements would be placed on it? • Who would have access? |

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| | <ul style="list-style-type: none">• Will AEMO's legislated indemnity apply to data that isn't covered under the Rules or Procedures? |
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