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FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: AusNet Services*

***Submission Date**: 15 February 2019*

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1. Context

This template is 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 1' consultation.

The changes being proposed are as a result of the Australian Energy Market Commission making a final rule to align operational dispatch and financial settlement at five minutes, starting 1 July 2021.

The Rule change requires the collection, storage and delivery of revenue metering data based on five-minute intervals for use in energy settlement, network and retail billing.

2. Metrology Procedure: Part A

Section	Description	Participant Comments
3.2	A type 4A or 5 metering installation must have an optical port that meets the AS 1284.10.2 or AS 62056.21 or a computer serial port to facilitate downloading of 90 days of interval energy data for each Datastream associated with the metering installation in 90 seconds or less.	AusNet Services supports this alteration allowing the download up to 90 seconds per Datastream.
3.5	Jurisdictional Update	
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter.	

Section	Description	Participant Comments
6	Jurisdictional Update	
7	Jurisdictional Update	AusNet Services supports the proposed removal of embedded network and reversion provisions on the basis of Victorian Orders in Council incorporate provisions for these arrangements.
9.3	Jurisdictional Update	
12.2	Jurisdictional Update	
12.4	Jurisdictional Update	
12.5	To validate that all metering data stored in the metering data services database is consistent with the energy data stored in the metering installation or the Physical Inventory (as applicable),	

3. Metrology Procedure: Part B

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

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
2.6.3	Update to TI	
4.4.4	Removal of NEM12 & NEM13 File Clarifications	
5	Updates to various Glossary items	In the first stage of Consultation, we made the comment the definition of Maximum Demand is fit for the purpose of allowing the customer to compare their Network Use of System charges (if the retailer passes these through to the customer). Despite the consultation response "revised definition now in Glossary and Framework document", the Maximum Demand definition is still "not for purpose" and does not allow Maximum Demand to be expressed in 30 minute periods if their billing charges utilize a 30 minute average maximum demand calculation method. Generally, the over-heating impacts on network assets are smoothed over by the thermal mass of equipment; hence 5 minute maximum demand billing approaches are not Cost Reflect. Our AER approved revenue is based on maximum demand calculated over a 30 minute. Hence, we strongly recommend changes that establish, where the customer is being billed on 30 minute demand, only 30 minute demand data needs to be provided. We submit the following suggested alteration. For 5 minute intervals, the highest 5 minute interval usage that occurs during each "To Date" period is identified and multiplied by

		12 to obtain the maximum demand expressed in kW, unless Demand charges are calculated over a different period. When Demand charges are calculated over a demand charging period, the Maximum Demand is the highest usage of consecutive 5 minute intervals over this defined period multiplied by the number of 5 minute intervals in the demand charging period multiplied by 2.

6. Meter Data Provision Procedure

7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	AusNet Services agree with the initial application of the proposed approach to profiling 15 and 30 minute meter reads to 5 minute trading intervals from July 2012. However, by Dec 2022 we expect there will be statically significant proportion of Type 4 and Type 5 AMI meters newly installed or replaced since Dec 2018. In our network, we are expecting about 13% of our AMI meters would be providing 5 minute data. Given this is the case, a new profiling approach to 5 minute trading intervals from 30 minute meter data would be justified. Rather than just subtracting all five-minute metering data to determine the shape of the 30 minute meter data, this sample shape from the 5 minute meters could also be used to shape the 30 minute metering data and then allocating any residual distortions to the accumulation load profile. In doing this, AEMO could have separate 30 minute profiles for solar, non-solar and I&C customers.
Meter Data Delivery to AEMO	AusNet Services supports, in principle, AEMO's proposed approach to utilise the NEM12 file for settlement purposes from 1 July 2021, and to allow Registered Participants to be progressively replaced by register level data stream records in the CATS NMI Data Stream table. The proposed "sunset period" of using the NEM12 "200 record" as the basis for identifying data registers will avoid unnecessary costs and risks associated with a bulk change on 1 July 2021, while allowing participants to progressively update MSATS every time a meter is created, exchange or updated to 5 minute delivery. We recommend that in setting this "sunset period" it is sufficiently long to de-risk the eventual bulk change of MSATS data by Market Participants. However, we consider the proposal for the use of non-energy register level data from 1 July 2021 has not been justified. Non-energy register level data is only typically used for demand tariff network billing. It is not a billable quantity in the NEM wholesale markets which AEMO operates. On this basis, we question why whole market would benefit in any way from AEMO receiving non-energy register level data.