

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Endeavour Energy

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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 Metering ICF Package Changes consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.4.(s)	Updated to include a new sub clause(s) for obligation on MDP to provide relationship mapping between Register ID and Datastream Suffix.	<p>The wording of this new obligation is ambiguous. However, we understand it is meant be that a MDP must correctly maintain datastream records and provide complete and correct information in the NEM12 metering data file so that AEMO can map the metering data provided in a NEM12 file to a datastream. If this is correct, then we suggest that this clause be reworded to make this clearer.</p> <p>However, if our understanding is incorrect then we suggest that AEMO makes it clearer what is expected of the MDP.</p>
4.4 Table 4-D	Updated to reflect the current jurisdictional requirements for Small and Large customers.	AEMO described the issue being that MCs were using, as per AEMO's guidance, the NMI Classification Code to determine if a customer is a small or large. However, the definition of the NMI Classification Code does not align with the definition of a small and large customer as per the NERL (noting that NERR defines who is a small and Large customer with jurisdictional instruments

Section	Description	Participant Comments
		<p>define the threshold that separates a small and large customer). Hence, AEMO is proposing to redefine the definition of the NMI Classification Code to align with the jurisdictional thresholds.</p> <p>NSW defines small customer as:</p> <ul style="list-style-type: none"> • all residential customers (regardless of how much energy they consume); and • a business customer who consumes less than 100MWh of energy per year <p>And a large customer as:</p> <ul style="list-style-type: none"> • a business customer who consumes 100MWh or more energy per year; or • a business customer who, in aggregate of 2 or more business premises, consume in total 100MWh or more energy per year <p>As defined, the determination of a small or large customer is dependent not only on the annual consumption, but also the type of customer and whether more than one business premises are to be considered. Therefore, we believe that redefining the NMI Classification Code will be insufficient as it only focuses on the consumption threshold part of the small or large customer definition.</p> <p>We note that when the National Energy Consumer Framework (NECF) was implemented, which introduced the definition of small and large customers, AEMO created two new fields in MSATS to accommodate this – the NMI Customer Classification Code (CCC) and the NMI Customer Threshold Code</p>

Section	Description	Participant Comments
		(CTC). The CCC is used by the FRMP to define whether the customer is residential or business and the CCC is used by the LNSP to define the annual consumption for a business customer. We believe that the most optimal solution is for the MC to reference the two fields and recommend that AEMO monitors compliance through weekly performance reports or via the annual MC audit.

3. MSATS Procedures: WIGS

Section	Description	Participant Comments

4. Metrology Procedure: Part A

Section	Description	Participant Comments

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.4	Update to remove 'N' Metering Data Quality Flag	We believe that the effective start date for this change should be 9 March 2021 when AEMO will be accepting NEM12 files in MSATS production.
13.2.2(a)(v)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	We support removing the 'End User Details' from the Inventory Table
13.3.2(a)(ii)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	
13.5.2(a)(v)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	

6. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
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7. NEM RoLR Processes Part A and Part B

Section	Description	Participant Comments
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8. Meter Data File Format Specification

Section	Description	Participant Comments
4.4	<p>Updated to remove the text in Definition column related to Meter Data Quality Flag 'N' against the Field InternalValue1...InternalValueN</p> <p>Updated to remove 'N' from Allowed Values against the Fields QualityMethod and ReasonCode</p> <p>Updated to remove the text in Definition column related to Quality Flag 'N' against Field UpdateDateTime</p>	<p>We believe that the effective start date for this change should be 9 March 2021 when AEMO will be accepting NEM12 files in MSATS production</p>
4.5	<p>Updated to remove 'N' from Allowed Values against the Fields QualityMethod and ReasonCode</p>	
Appendix C	<p>Update to remove the row related to Quality flag 'N'.</p>	

9. Standing Data for MSATS

Section	Description	Participant Comments
9.1	Amend the description of RegisterID in Table 18	<p>We note that RegisterID is valuable for an accumulation meter but has little value for an interval meter, however this field must still be populated for interval meters. We reviewed the RegisterID and Suffix values for the 10 active contestable metering service providers operating in our network area and found that 8 out of the 10 metering service providers already provide RegisterIDs that aligns with the Suffix. Therefore, we do not consider AEMOs' proposal to make RegisterID the same as the Suffix for interval meters to be unreasonable.</p> <p>We believe that the long-term advantage of making RegisterID the same as the Suffix for interval meters will be less confusion when referencing and linking this information with the metering data and change requests.</p> <p>We acknowledge that the short-term disadvantage for some metering service providers is system changes and a once off data update for existing records. We encourage AEMO and the impacted metering service providers to work together to manage the transition and agree on a transition timeframe that minimises the impacts.</p> <p>Therefore, we recommend that AEMO maintains the requirement for the RegisterID to be the same as the Suffix for interval meters.</p> <p>We also note that some metering service providers who provide RegisterIDs that aligns with the Suffix do not always do so consistently. If the RegisterID does not have to be the same as the Suffix field then it should be made clear that if a MPB did want to provide a suffix value in the</p>

Section	Description	Participant Comments												
		<p>RegisterID field then it must be the same as the Suffix field. This is to avoid confusion.</p> <p>For example:</p> <table border="1" data-bbox="1077 440 1888 922"> <thead> <tr> <th>RegisterID</th> <th>Suffix</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>01</td> <td>E1</td> <td>Acceptable, RegisterID value is not an interval metering data suffix value</td> </tr> <tr> <td>E2</td> <td>E2</td> <td>Acceptable, RegisterID value is an interval metering data suffix value and is the same as the Suffix field</td> </tr> <tr> <td>E1</td> <td>E3</td> <td>Not acceptable, RegisterID value is an interval metering data suffix value but is not the same as the Suffix field</td> </tr> </tbody> </table> <p>Therefore, we suggest adding the following to the definition of RegisterID if the requirement for the RegisterID to be the same as the Suffix for interval meters is not adopted:</p> <p>If the RegisterID has a value as per the 'Datastream Suffix for Interval Metering Data' section of the NMI Procedure, then it must be the same as the Suffix field.</p>	RegisterID	Suffix	Comments	01	E1	Acceptable, RegisterID value is not an interval metering data suffix value	E2	E2	Acceptable, RegisterID value is an interval metering data suffix value and is the same as the Suffix field	E1	E3	Not acceptable, RegisterID value is an interval metering data suffix value but is not the same as the Suffix field
RegisterID	Suffix	Comments												
01	E1	Acceptable, RegisterID value is not an interval metering data suffix value												
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10. Retail Electricity Market Procedures – Glossary and Framework

Section	Description	Participant Comments
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11. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
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