

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: CitiPower Powercor

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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 (v4.94)

Section	Description	Participant Comments
2.4.(s)	Updated to add text clarifying the relationship mapping	
2.7	Updated to fix the issue with reference link	
2.9.(k)	Updated to fix the issue with grammar	
4.4 Table 4-D	<p>Updated to reflect the current jurisdictional requirements and definitions of Small and Large customers. AEMO also seeks responses to the following questions:</p> <ol style="list-style-type: none"> 1. What other improvements could be made to Table 4-D? 2. What might be any benefits/detriments of the proposed changes to Table 4-D noting that the MWh descriptions for 	

Section	Description	Participant Comments
	<p>small customers relate to business customers, but not residential customers, for whom the corresponding description is “any MWh”, across “all” jurisdictions?</p> <p>3. What is the nature of any inconsistencies which may exist?</p> <p>4. What consequential changes are necessary to the Code Information?</p> <p>5. What, if any, are the unintended consequences of the proposed changes?</p>	
12.6.3	Updated to fix the issue with reference link	

3. MSATS Procedures: WIGS (v4.94)

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	

4. Metrology Procedure: Part A (v7.31)

Section	Description	Participant Comments
12.5	Reverted wording from 'Validation' to 'Verification' throughout the clause	
12.5		<p>We note that AEMO acknowledges concerns raised by all 5 Victorian networks in section 4.1.1 of the draft determination report but then does not address them in its assessment or conclusion in sections 4.1.2 and 4.1.3 and the drafting of this section and relevant clause is left unchanged.</p> <p>We do note the revision of the Retail Glossary definition of Vic AMI Meters referred to in table 4, item 3, against similar concerns over clause 12.5, but it is not clear how AEMO then considers this to be interpreted in terms of clause 12.5 (or the Service Level Procedure Meter Provider clause 4.2).</p> <p>In the interest of removing any doubt we recommend the following clauses be amended to explicitly state:</p> <p>12.5. Verification of Metering Data for whole current Small Customer Metering Installations, <u>whole current Vic AMI Meter Installations</u>, Manually Read Metering Installations and Type 7 Metering Installations</p> <p>To facilitate the Verification of <i>metering data</i> for whole current <i>small customer metering installations</i>, <u>whole current Vic AMI Meter</u></p>

Section	Description	Participant Comments
		<p><u>Installations</u>, manually read <i>metering installations</i> and type 7 <i>metering installations</i>:.....</p> <p>While it's clear that AEMO procedures accept and define Vic AMI meters as 'MRIM' within MSATS, (MRIM is an abbreviation for 'Manually Read Interval Meter' and equated to 'Type 5' in the original wording of clause 12.5), the revised wording refers to manually read metering installations, and subsequently could be expected to mean those meters are physically 'manually read' rather than those defined as 'MRIM'.</p> <p>It is unclear why AEMO specifically calls out 'small customer metering installations' but is reluctant to specifically call out 'Vic AMI meter installations' given they are the direct equivalents within the Victorian NER?</p> <p>Equally, it's not clear why these coupled requirements for undertaking Verifications need to be spread across two separate procedures in the form of clause 4.2 in the SLP Meter Provider and clause 12.5 in the Metrology Procedure Part A?</p>
12.6	Amended the wording from 'Validation' to 'Verification' throughout the clause	

5. Metrology Procedure: Part B (v7.03)

Section	Description	Participant Comments
9	Amended the wording from 'Validation' to 'Verification' throughout the clause	

6. Service Level Procedure Meter Provider Services (v1.5)

Section	Description	Participant Comments
4.2		<p>As per our feedback above (in relation to Metrology Procedure Part A clause 12.5), and to remove any ambiguity in relation to the applicability to Vic AMI Meters, we recommend the following changes to the below portions of clause 4.2 of the Metering Provider Service Level Procedure:</p> <p>(ii) For a <i>metering installation</i> that is not a whole current <i>small customer metering installation</i> <u>or whole current Vic AMI Meter Installation</u>,</p> <p>(iii) For whole current <i>small customer metering installations</i> and <u>whole current Vic AMI Meter Installations</u>,</p>
4.2	Amended the wording from 'Validation' to 'Verification'	
4.2.(a)(ii)	Amended the wording from 'Validated' to 'Verified'	
4.2.(a)(iii)	Reverted wording from 'Validated' to 'Verified'	
4.2.(b)	Reverted wording from 'Validated' to 'Verified'	

4.2.(c)	Amended the wording from 'Validation' to 'Verification' and 'Validated' to 'Verified'	
4.2.(c)(ii)	Reverted wording from 'Validate' to 'Verify'	
4.2.(d)	Reverted wording from 'Validate' to 'Verify'	
4.4.(e)	Amended 'New MDP' to 'MDP'	

7. NEM RoLR Processes Part A and Part B (v2.1)

Section	Description	Participant Comments
11.2.(h)(v)	Removed reference to Table 10-B, Table 10-C and Table 10-D	
11.2.(i)	Amended to remove obligation requirement of section 11.2(k)	
11.2.(j)	Amended section reference from 11.2(k) to 11.2(j)	
11.2.(k)	Amended to reflect compliance requirement with section 11.2(i)	
13.3.(k)	Amended to remove reference to section	

	13.3(m)	
13.3.(l)	Amended section reference from 13.3(l) to 13.3 (k)	
17.2.(c)	Further amendment to replace 'inactivate' with 'deactivate'	

8. Meter Data File Format Specification (v2.2)

Section	Description	Participant Comments
3.3.1.(b)	Amended to only remove reference to 'N'	

9. Standing Data for MSATS (v4.51)

Section	Description	Participant Comments
8 Table 7	Amended description of Data Element 'AveragedDailyLoad'	
9 Table 8	Amended description of Data Element 'Suffix'	

10. Retail Electricity Market Procedures – Glossary and Framework (v3.41)

Section	Description	Participant Comments
5	Amended definition of 'Validation'	
5	Added new definition for 'Verification'	Please amend 'installaed' to installed.
5	Amended definition of 'VICAMI Meter'	

11. Other Issues Related to Consultation Subject Matter

Participant Comments