

# 5MS/CS CONSOLIDATION PROCESS

## STAKEHOLDER RESPONSE TEMPLATE

***Stakeholder:***                    *AGL*

***Submission Date:***            *25 May 2021*

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## 1. Context

AEMO is conducting the process (Consolidation Process) in respect of the proposal (Consolidation Proposal) to consolidate, effective from 1 October 2021, the versions of the Retail Electricity Market Procedures (Consolidating Procedures) which have been changed through previous consultations (Changed Procedures) to enable the following rules under the National Electricity Rules (NER):

- a) National Electricity Amendment (Five Minute Settlement) Rule 2017 No. 15 (5MS).
- b) National Electricity Amendment (Reducing customers' switching times) Rule 2019 No. 14 (CS).

AEMO provides this template to assist stakeholders to submit written responses in respect of the Consolidation Proposal.

## 2. Stakeholder Comments

| AEMO Question   | Stakeholder Response   |
|---|--|
| 1) Has AEMO consolidated the procedures effective 1 October 2021 correctly?   | AGL believes that the procedures have been consolidated correctly.   |
| 2) What is the nature of any unintended consequences or errors in the consolidation?  | See examples below.<br>Some drafting can be improved without changing intent and cleaned up, in particular CI 4.3 MSATS: CATS.     |
| 3) What are the alternative or additional proposals which you consider may better meet the objectives of the consolidation? | See below –<br>Following the completion of this consultation, AGL suggests that the Glossary could use a careful review / tidy up. |
| 4) Do you have any further questions or comments in relation to the consolidation?  | See comments above and below.  |

**Other Comments**

**General Comment**

There seems to be a very inconsistent use of capitalisation of numbered and sub-numbered clauses. For instance, there are a number of capitalisations through the Metrology – Part B procedure, (although this is not applied consistently – eg 3.3.38). However, the same has not occurred in the CATS procedure.

**Document:** Retail Glossary; Metrology Part B; MSATS: CATS.

On reviewing the Retail Glossary, there seem to be a number of poor definitions and inconsistent application of acronyms. Some examples are shown below. AGL suggest that an update be undertaken to bring the Glossary up to date.

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| Section    | Description              | Participant Comments   |
|------------|--------------------------|--|
| 5 Glossary | Consistent approach      | <p>Some definitions have both the acronym and the full title separately shown in the glossary – eg ENLR / Embedded Network Service Provider – whereas other definitions place the full title in the definition – eg EENSP.</p> <p>AGL suggests that a consistent approach be adopted for these terms which may be known by acronyms and their extended title and consistent formatting – eg ASP, or HV CT.</p>   |
| 5 Glossary | ‘Current Participant’    | <p>The proposed change refers to Cl 2.11 (presumably of the Glossary), which in turn simply states that:</p> <p style="padding-left: 40px;">‘The NMI Master Record will always detail the ‘Current’ Roles associated with a NMI.’</p> <p>While it is useful to understand where the current roles are identified, this does not give clarity as to what a current role is.</p> <p>AGL suggests that the definition be extended to include some reference to the Participant having obligations for activities at that NMI at that point in time.</p> |
| 5 Glossary | ‘Field Validation Rules’ | <p>The definition is useful, but it does not assist the reader in identifying where the validation rules may be found, which can be very useful during development or in assessing transaction errors</p>  |
| 5 Glossary | First-Tier load          | <p>First -Tier load refers to local retailer which is not defined, although LR is specified.</p> <p>Also, with Global settlement, this definition should be reviewed.</p>  |
| 5 Glossary | Historical data          | <p>While Metering Data is the most likely historical Data, participant roles and NMI status are may also represent historical Data. Suggest updating the definition.</p>   |
| 5 Glossary | Lot Number               | <p>Lot Numbers do not expire when street numbers are assigned.</p>   |

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| Section    | Description                | Participant Comments   |
|------------|----------------------------|--|
| 5 Glossary | LR                         | See comment above  |
| 5 Glossary | Manually Read              | It is interesting that the definition refers to data collection by using the inverse of remote collection.<br><br>It would be better to specify that it is by a physical visit to the meter with a manual interaction to collect the data – either viewing the registers or downloading via a cable. |
| 5 Glossary | New [Participant/Role]     | See comments above re current role.  |
| 5 Glossary | Off-Market                 | The definition is quite specific, however, the term is also used to describe transactions not undertaken via B2B or B2M.<br><br>Suggest update the definition.   |
| 5 Glossary | Previous Read Dates        | Previous Read Dates are records of dates where data has been provided by the MDP and recorded in MSATS – not provided by MSATS.  |
| 5 Glossary | Previous Read Quality Flag | MSATS records the read quality based on information in the meter data file.<br><br>Suggest update the definition.  |
| 5 Glossary | Second Tier Load           | Update for Global Settlements  |
| 5 Glossary | UFE                        | A reference to how this amount is calculated would be helpful.<br><br>Suggest update the definition.   |
| 5 Glossary | New definition             | Non-Contestable unmetered load is not defined, nor is type 7 load.   |

**Document: Metrology Procedure -Part B**

| Section      | Description | Participant Comments   |
|--------------|-------------|--|
| Met – Part B | CI 11.4     | <p>Both the calculation and formula specify 'TI load (including type 7) ..' but it is unclear if Non contestable unmetered load should also be included in this calculation, as there is generally a distinction between type 7 (which is defined as a market load - see CI 13.1) and other non-contestable loads within the procedures.</p> <p>Also note: CI 3.11. of the SLP_MDP specifically separates type 7 and non-contestable</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p><b>3.11. Specific Metering Data Estimation Requirements for Manually Read Metering Installations and Calculated Metering Data</b></p> <p>(a) Each MDP must have a process for the creation of <i>estimated metering data</i> for metering installation types 4A, 5, 6 and 7 <u>and for non-contestable unmetered loads.</u></p> </div> |

**Document: MSATS: CATS**

| Section   | Description  | Participant Comments   |
|-----------|--|--|
| Cl 2.1(e) | Missing number identifier  | Cl 2.1(e) has three obligations although the third (regarding compliance) is not separately numbered   |
| Cl; 4.3   | Badly ordered and the third reason is the same as the first reason | Suggest:<br>(a) A participant can only object using the codes listed in Table 4-C;<br>(b) The basis of using such an Objection Code is that the Participant is able to produce evidence to substantiate that the Objection was:<br>i. Fair and reasonable...<br>ii. << compliant??>>>> |
|           |  | Etc  |