

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Ausgrid

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the Retail Electricity Market Procedures March 2021 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. Service Level Procedure: Metering Data Provider Services (SLP: MDP Services)

Section	Description	Participant Comments
2.4.3 Reactive Energy	<p>Amend the wording to read:</p> <ul style="list-style-type: none"> (a) Subject to paragraph (b), where the <i>metering installation</i> is configured to measure <i>reactive energy</i>, the MDP must store this <i>metering data</i> with the <i>metering data</i> in respect of <i>active energy</i> in the <i>metering data services database</i>. (b) The <i>MDP</i> is not subject to the storage requirement in paragraph (a), if the <i>metering data</i> in respect of <i>reactive energy</i> as measured by a Type 4 <i>small customer</i>, type 5 or VICAMI <i>metering installation</i> is not required for the current purposes of either: <ul style="list-style-type: none"> (i) provision to a requesting party, as may be required for the purposes of additional services under NER 7.4.3; or (ii) application of a <i>reactive energy</i>-based network tariff or if required by the FRMP in order to calculate the energy user’s bill. 	
New clause	Insert new clause:	As Ausgrid highlighted in ERCF discussions,

Section	Description	Participant Comments
2.4.1(a)(ix)	<p><u>Ensure that systems and processes are in place to detect <i>energy data</i>, at least every 20 business days, when the datastream is not active for a <i>metering installation with remote acquisition</i>.</u></p>	<p>there is an AEMO CATS compliance metric to change the NMI status to 'A' within 5 business days, this Metric is NMIST1 and is a part of the LNSP compliance reporting. Where a NMI with a Type1-4 meter is installed and has been disconnected at the request of the retailer and the MDP picks up consumption, Ausgrid will change the NMI status to 'A'. If the MDP is only obligated to monitor energy data only every 20 days then if this is done on day 20 and the data sent to the LNSP then the LNSP will have to change the NMI status to A and this may be outside the 5 day requirement set by AEMO's CATS procedure and cause a non compliance to the LNSP for no fault of their own.</p> <p>Ausgrid suggests that this metric is changed from 20 days to 5 days so as not to cause compliance issues on the LNSP. If this is not suitable then Ausgrid expects that AEMO modify their reports to remove these non compliance errors from the LNSP reports.</p>
Renumbered clauses	Clauses renumbered following above change.	
3.5 Specific Collection	<p>Insert new clause:</p> <p><u>(c) Each MDP must operate and maintain a process so that on the next</u></p>	

Section	Description	Participant Comments
Process Requirements for Metering installations with Remote Acquisition of Metering Data	<i>business day</i> after which a period of, at most, five consecutive <i>business days</i> where remote acquisition is unavailable, the <i>MDP</i> must notify the <i>MC</i> that <i>remote acquisition</i> is unavailable.	

3. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)

Section	Description	Participant Comments
12.2 Metering Data Collection	Insert new clauses: (k) When the MC is informed of a metering data collection issue, the MC must: (i) within 15 business days, take the necessary steps to have the missing metering data collected; (ii) ensure that the metering installations' communications interface is maintained to facilitate ongoing collection of metering data; (iii) ensure that metering data is collected at a frequency that is within the energy data storage capacity of that metering installation such that the metering data collection process	

Section	Description	Participant Comments
	<p>prevents the loss of actual metering data; and</p> <p>(iv) ensure that, irrespective of the energy storage capacity of the metering installation, the metering installation reading frequency must not exceed three months since the last actual read was undertaken.</p>	

4. Guideline for Clarification of the National Measurement Act

Section	Description	Participant Comments
1.1	<p>This is the Guideline for Clarification of the National Measurement Act made under clause 7.15 <u>7.16.8</u> of the NER (Guideline).</p> <p>...</p> <p>This version of the Guideline makes reference to those parts of the National Measurement Act that are currently in force. For information, the Guideline also makes reference to aspects of Part IV of the Act, which is expected to come into force in the near future when changes to the National Trade Measurement Regulations are made. Those aspects of the Act that are not currently in force appear in italics in this version of the Guideline.</p>	

3.1; 3.2.1; 3.2.2; 3.3	Minor changes	
3.3	Regulation 5.6 in the National Trade Measurement Regulations 2009 exempts certain classes of electricity meters from Part IV section 4A of the Act. (The exemption was previously located in the National Measurement Regulations); and	
5.1.2; 5.2; 5.2.1; 5.2.2; 5.2.4; 5.3	Minor changes	
6.1	<p><i>National Trade Measurement Regulations 2009, Regulation 5.6, “Exempt utility meters”:</i></p> <ul style="list-style-type: none"> For the definition of utility meter in subsection 3(1) of the Act, the following classes of meters are exempted from the operation of Part IV section 4A of the Act: <ul style="list-style-type: none"> (b) electricity meters installed before 1 January 2013; (ba) electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 750 MWh of energy per year; 	
6.2; 7; 8.3; Appendix C	Minor changes	

5. MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure

Principles and Obligation (MSATS Procedures: CATS)

Section	Description	Participant Comments
9.1.4; 9.2.4; 9.3.4; 9.4.4; 12.2.4; 12.2.5; 12.3.4; 12.5.4	Removes obligation for LNSP and ENM to populate a Change Request with Connection Configuration.	
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	
10.1.4(d); 10.2.4(d); 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	
10.4.4(d); 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	
15.1.4(d); 15.1.4(f)	Changes position of reference to Connection Configuration for AEMO from 15.1.4(d) to 15.1.4(f).	
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	

6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS)

Section	Description	Participant Comments
4.1.4; 4.2.4; 4.3.4; 7.1.4; 7.1.5; 7.2.3; 7.3.4	Removes obligation for LNSP and ENM to populate a Change Request with Connection Configuration.	
5.2.4(d); 5.3.4(d); 5.4.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	
9.1.4(b)(i); 9.1.4(b)(iii)	Changes position of reference to Connection Configuration for AEMO from 9.1.4(b)(i) to 9.1.4(b)(iii).	

7. Standing Data for MSATS (Standing Data document)

Section	Description	Participant Comments
Table 6 (CATS_N MI_DATA)	Change location of ConnectionConfiguration field to Meter Register table.	See below comments.
Table 3 (CATS_M)	ConnectionConfiguration field to be updated as follows:	The proposed connection configuration proposal put forward by AEMO in the draft report is far too complex and difficult to populate accurately.

Section	Description	Participant Comments
ETER_REG ISTER)	<p>Two-character code to denote information about the configuration of the connection point.</p> <p>First Character = Connection Type</p> <p>H = <i>High voltage</i> (as defined in the NER)</p> <p>L = Low voltage (lower than the threshold defined for <i>high voltage</i> in the NER)</p> <p>Second Character</p> <p>A = single phase supply/single phase metering</p> <p>B = 2 phase supply/one phase with single phase meter</p> <p>C = 2 phase supply/two phases each with single phase metering</p> <p>D = 2 phase supply/ two phase metering</p> <p>E = 3 phase supply/one phase with single phase metering</p> <p>F = 3 phase supply/two phases each with single phase metering</p> <p>G = 3 phase supply/two phase metering</p> <p>H= 3 phase supply/three phases each with single phase metering</p> <p>J = 3 phase supply/three phase metering</p> <p>K = SWER</p> <p>MANDATORY where there is an installed meter</p>	<p>Ausgrid acknowledges that the proposed changes to the configuration field were to meet the requirements of ICF 37, which was to make the MP responsible for the field and assist the MP in determining the metering configuration onsite prior to a site visit. As there can be multiple metering configurations at a NMI, this information should be located at a meter level if this is what the intent of the field is.</p> <p>However, the implementation of that change, by moving the connection information from the NMI to the Meter, has led to a high degree of complexity. This, in turn, has moved the proposed field a long way from the original intent, which was connection information at a NMI level.</p> <p>As such, we propose that the proposed change sought by ICF 37 be rejected and revert to the original proposal, which was connections at a NMI, with the data captured on the CATS_NMI_DATA table as currently specified, with the information relating to the supply at the NMI, not the premise, irrespective of existing metering. This would result in the 2nd character of this field being set to one of 1,2 or 3. In addition, Ausgrid requests that the field is either not implemented into MSATS or not made as a mandatory field until industry has determined its expected functionality, population of information into this field will be misleading and of limited use to participants if not accurately completed.</p>

Section	Description	Participant Comments
	Field to be provided by LNSP MPB	

8. Questions on proposed changes

Heading	Participant Comments
<p>With regards to ICF_037 Connection Configuration, do you consider that the field would be better split to allow the LNSP to provide the expected supply connection to the site and the MPB to provide the supply at the metering level?</p>	<p>Ausgrid can see a benefit for applying a connection configuration at a NMI level for Greenfield sites only (populated by the LNSP) and a metering configuration at a meter level (populated by the MPB). However this is out of scope of what is being proposed by ICF_037 and any changes should be developed via a new ICF developed by the industry.</p>