

4 June 2021



Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
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MELBOURNE VIC 3001

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Dear Mr Westerman

Consultation – Electricity Retail Market Procedures March 2021

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) in response to its Electricity Retail Market Procedures March 2021 consultation.

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited;
- Retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Please find enclosed comments to the consultation questions.

Yours sincerely

A handwritten signature in blue ink that reads "Alena Christmas".

Alena Christmas
Acting Manager Regulation

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Encl: Energy Queensland comments to consultation questions

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Ergon Energy and Energex Networks, Ergon Energy
Queensland, Yurika (MDYMP)

Submission Date: 4/06/2021

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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. 	Energy Queensland provides no comment.

Section	Description	Participant Comments
New clause 2.4.1(a)(ix)	Insert new clause: <u>Ensure that systems and processes are in place to detect energy data, at least every 20 business days, when the datastream is not active for a metering installation with remote acquisition.</u>	Energy Queensland provides no comment.
Renumbered clauses	Clauses renumbered following above change.	Energy Queensland provides no comment.
3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data	Insert new clause: <u>(c) Each MDP must operate and maintain a process so that on the next business day after which a period of, at most, five consecutive business days where remote acquisition is unavailable, the MDP must notify the MC that remote acquisition is unavailable.</u>	Energy Queensland provides no comment.

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

Section	Description	Participant Comments
12.2 Metering Data Collection	Insert new clauses: <u>(k) When the MC is informed of a metering data collection issue, the MC must:</u>	Energy Queensland proposes that clause 12.2(k)(iv) is updated to include the following additional bold text:

Section	Description	Participant Comments
	<ul style="list-style-type: none"> (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 prevents the loss of actual metering data; and (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>ensure that, irrespective of the energy storage capacity of the metering installation, the metering installation reading frequency must not exceed three months or the agreed meter reading frequency (as per 12.2 (j)) 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 7.16.8 of the NER (Guideline).</p> <p>...</p>	<p>Energy Queensland provides no comment.</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	Energy Queensland provides no comment.
3.3	<p>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</p>	Energy Queensland provides no comment.
5.1.2; 5.2; 5.2.1; 5.2.2; 5.2.4; 5.3	Minor changes	Energy Queensland provides no comment.
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; 	Energy Queensland provides no comment.

	(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	Energy Queensland provides no comment.

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.	As per comments provided in section 7 and 8.
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	As per comments provided in section 7 and 8.
10.1.4(d); 10.2.4(d); 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	As per comments provided in section 7 and 8.

Section	Description	Participant Comments
10.4.4(d); 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	As per comments provided in section 7 and 8.
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).	As per comments provided in section 7 and 8.
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	As per comments provided in section 7 and 8.

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.	As per comments provided in section 7 and 8.
5.2.4(d); 5.3.4(d); 5.4.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	As per comments provided in section 7 and 8.

Section	Description	Participant Comments
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).	As per comments provided in section 7 and 8.

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.	Energy Queensland provides no comment.
Table 3 (CATS_M ETER_REG ISTER)	<p>ConnectionConfiguration field to be updated as follows:</p> <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>	Energy Queensland does not support the current approach proposed by AEMO. We suggest further consideration is warranted to ensure lowest cost, reduced duplication for market participants and the burden of establishment and ongoing administration is minimised.

Section	Description	Participant Comments
	<p>B = 2 phase supply/one phase with single phase meter C = 2 phase supply/two phases each with single phase metering D = 2 phase supply/ two phase metering E = 3 phase supply/one phase with single phase metering F = 3 phase supply/two phases each with single phase metering G = 3 phase supply/two phase metering H= 3 phase supply/three phases each with single phase metering J = 3 phase supply/three phase metering K = SWER</p> <p>MANDATORY where there is an installed meter Field to be provided by LNSP MPB</p>	

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</p>	<p>As per comments provided in section 7.</p>

Heading	Participant Comments
LNSP to provide the expected supply connection to the site and the MPB to provide the supply at the metering level?	