

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: SA Power Networks

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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. 	No comment
New clause	Insert new clause:	No comment

Section	Description	Participant Comments
2.4.1(a)(ix)	<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>	
Renumbered clauses	Clauses renumbered following above change.	No comment
3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data	Insert new clause: <u>(c) Each <i>MDP</i> must operate and maintain a process so that on the next <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.</u>	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 <i>MC</i> is informed of a metering data collection issue, the <i>MC</i> must:</u> <u>(i) within 15 business days, take the necessary steps to have the</u>	No comment

Section	Description	Participant Comments
	<p>missing metering data collected;</p> <p>(ii) ensure that the metering installations' communications interface is maintained to facilitate ongoing collection of metering data;</p> <p>(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</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 7.16.8 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</p>	No comment

	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.	
3.1; 3.2.1; 3.2.2; 3.3	Minor changes	No comment
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	No comment
5.1.2; 5.2; 5.2.1; 5.2.2; 5.2.4; 5.3	Minor changes	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; (ba) electricity meters installed on or after 1 January 2013, other than electricity meters that measure less 	No comment

	than 750 MWh of energy per year;	
6.2; 7; 8.3; Appendix C	Minor changes	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.	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)
10.1.4(d); 10.2.4(d); 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)
10.4.4(d); 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)
15.1.4(d); 15.1.4(f)	Changes position of reference to Connection Configuration for AEMO from 15.1.4(d) to	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)

Section	Description	Participant Comments
	15.1.4(f).	
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)

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.	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)
5.2.4(d); 5.3.4(d); 5.4.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)
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).	See comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)

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 comment within Section 7 Standing Data for MSATS - Table 3 (CATS_METER_REGISTER)
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 = <i>Low voltage</i> (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>SA Power Networks do not support the changes made to the Second Character (inclusion of letters A to K and the associated descriptions).</p> <p>The original purpose of this field and information was to provide a simple view of the connection point characteristics i.e. is the connection point = single phase, two phase or three phase.</p> <p>The proposed changes introduced as part of this draft determination have over complicated this field, will result in confusion on how it should be populated, inaccuracies of data and remove the value of the information.</p> <p>SA Power Networks request that the changes be reverted back to:</p> <p><i>Two-character code to denote information about the configuration of the connection point.</i></p> <p><i>First Character = Connection Type</i></p> <p><i>H = High voltage (as defined in the NER)</i></p> <p><i>L = Low voltage (lower than the threshold defined for high voltage in the NER)</i></p> <p><i>Second Character = Phases In Use</i></p> <p><i>1 = Single Phase</i></p> <p><i>2 = Two-Phase</i></p> <p><i>3 = Three-Phase</i></p> <p><i>Mandatory where there is an installed meter</i></p> <p><i>Field to be provided by MPB</i></p>

Section	Description	Participant Comments
	<p>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</p> <p>Field to be provided by LNSP MPB</p>	<p>SA Power Networks requests that if the decision is made to revert the location of this field back to NMI level (as published in the final determination of the MSATS Standing Data Review Consultation) that it is clear that what should be recorded is the Connection Configuration of the actual NMI only and not include any upstream network phase capabilities.</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 LNSP to provide the expected supply connection to the site and the MPB to provide the supply at the metering level?</p>	<p>No, we do not see benefit in this proposal.</p>