

RETAIL ELECTRICITY MARKET  
PROCEDURES MARCH 2021  
CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT  
RESPONSE TEMPLATE

***Participants:***    *AGL*  
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## Table of Contents

1. Context .....	3
2. Service Level Procedure: Metering Data Provider Services (SLP: MDP Services).....	4
3. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A) .....	6
4. MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS).....	8
5. Standing Data for MSATS (Standing Data document) .....	10
6. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework) .....	11
7. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS).....	13
8. Questions on proposed changes .....	14

## **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. 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> <p>(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>.</p> <p>(b) The MDP 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>metering installation</i> is not required for the current purposes of either:</p> <p style="padding-left: 40px;">(i) provision to a requesting party, as may be required for the purposes of additional services under NER 7.4.3; or</p> <p>application of a <i>reactive energy</i>-based tariff.</p>	AGL supports the change
New clause 2.4.1(a)(ix)	<p>Insert new clause:</p> <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</i> with remote acquisition.</u></p>	AGL supports the change

Section	Description	Participant Comments
Renumbered clauses	Clauses renumbered following above change.	AGL supports the change
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 by the fifth consecutive day that remote acquisition is unavailable the MDP notifies the MC.</u>	<p>AGL supports the concept of Meter data collection but does not support the drafting which has been proposed by AEMO. See confidential submission for other details.</p> <p>A remote meter could lose comms due to a network disconnection. Under MSATS: CATS Procedures networks are not required to update MSTAS for 5 days. Therefore this amendment does not allow the MDP to determine if there has been a network disconnection prior to referring the issue to the MC.</p> <p>AGL notes that earlier drafting allowed 15 days, but proposes that the activity occur on the next business day after 5 consecutive days of no data – proposed drafting supplied.</p> <p><b>SLP – CI 3.5 – Proposed re-drafting</b></p> <p>(c) Each MDP must operate and maintain a process so that on the next business day, after five consecutive days where remote acquisition is unavailable, the MDP notifies the MC.</p>

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

Section	Description	Participant Comments
12.2 Metering Data Collection	<p>Insert new clauses:</p> <p><u>(k) The MC must use reasonable endeavours to identify if a metering installation malfunction exists within 7 days from when an MDP informs them that remote acquisition is not available.</u></p> <p><u>(l) For metering installations that have remote acquisition, the MC must use reasonable endeavours to collect metering data at a frequency that prevents the loss of actual metering data but at a frequency of no more than 14 days since the last actual metering data was collected when remote acquisition is not available.</u></p>	<p>AGL supports the concept of collecting actual meter data and minimising meter data loss, but does not support the drafting which has been proposed by AEMO. See confidential submission for other details.</p> <p>The process which would result from the proposed drafting would see a unnecessary number of site visits for no appreciable effect. The cost of site visits is high, relative to the energy vale, and the original proposal allowed for detection of external issues (eg DNSP disconnection, Telco issue), a service order request, issuing of an interruption notice to customers prior to the initial visit, and then the minimum number of site visits (up to 3 monthly) for data collection.</p> <p>The drafting as provided could see a site visited between 5 and 7 visits over a 3 month period compared to 1 or 2 times for problematic comms site. These additional visits would provide no appreciable benefit to customers or industry.</p>

Section	Description	Participant Comments
		<p><b><u>Metrology Procedure – Part A – Proposed amended drafting</u></b></p> <p>CI 12.2</p> <ul style="list-style-type: none"> <li>(k) When the MC is informed of a meter data collection issue, the MC must use reasonable endeavours to:               <ul style="list-style-type: none"> <li>(i) within 15 business days, take the steps to have the missing data collected;</li> <li>(ii) have the metering installations communications system maintained to ensure ongoing data collection; and</li> <li>(iii) ensure that metering data is collected at a frequency that is within the data storage capacity of that meter/s such that the data collection prevents the loss of actual metering data,</li> <li>(iv) read the meter at a frequency of no more than 3 months since the last actual read was undertaken, irrespective of the meter memory capability</li> </ul> </li> </ul>

#### 4. MSATS Procedures: Constomer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS)

Section	Description	Participant Comments
<p>9.1.4 9.2.4 9.3.4 9.4.4 12.2.4 12.2.5 12.3.4 12.5.4</p>	<p>Removes obligation for LNSP and ENM to populate a Change Request with Connection Configuration.</p>	<p>While AGL is supportive of the connection configuration data being collected, and the long-term benefits of this change, the move of Connection Configuration information from NMI to meter could create unexpected consequences as the data relevant to a meter is not necessarily the same data relevant to a connection point.</p> <p>For example, if there was a 3-phase supply at the NMI the connection information should be 3 L. But if the customer is metered with 3 x single phase meters, the connection configuration for the meters might all be 1 L.</p> <p>Equally, you could have the same meter configuration for a single-phase supply with 3 single phase meters (eg controlled load, lighting, general power) all as 1 L.</p> <p>In these examples, the incorrect information is being collected and reported.</p> <p>AGL considers that the most accurate way to collect the information is to minimise the number of parties actually generating that information and to ensure it reflects the connection point and not downstream assets.</p> <p>Further, AGL also considers that this proposed change is very likely to lead to incorrect information being collected, due to misunderstanding of how to capture what was meant to be connection information for the NMI, not information associated with each meter.</p> <p>AGL therefore proposes that this change be rejected and that the LNSP retain the obligation to collect this data from their current work processes (or data collection programs – eg NOMWs) and update MSATS.</p>
<p>9.3.4(h)</p>	<p>Allows LNSPs to populate the Change Request with Connection Configuration information</p>	<p>See above</p>



Section	Description	Participant Comments
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 Above
10.4.4(d) 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	See above
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).	<p>AGL supports the change, however, notes that Connection Configuration is still listed in 15.1.4(d) above GNAF PID</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <p>Aggregate Flag</p> <p>Connection Configuration</p> <p>GNAF PID</p> <p>DP Number</p> <p><del>Connection Configuration</del></p> </div>
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	See above

## 5. 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 Q4.
Table 3 (CATS_M ETER_REG ISTER)	ConnectionConfiguration field to be updated as follows:  MANDATORY <a href="#">where there is an installed meter</a>  Field to be provided by <del>LNSP</del> <a href="#">MPB</a>	See Q4.

## 6. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)

Section	Description	Participant Comments
1.1	<p>This is the Guideline for Clarification of the National Measurement Act made under clause <del>7.15</del> <a href="#">7.16.8</a> of the NER (<b>Guideline</b>).</p> <p>...</p> <p>This version of the Guideline makes reference to those parts of the National Measurement Act that are currently in force. <del>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.</del> Those aspects of the Act that are not currently in force appear in italics in this version of the Guideline.</p>	AGL supports this change.
3.1 3.2.1 3.2.2 3.3	Minor changes	AGL supports this change.

Section	Description	Participant Comments
3.3	Regulation 5.6 in the National Trade Measurement Regulations 2009 exempts <a href="#">certain classes of</a> electricity meters from <del>Part IV section 4A</del> of the Act. (The exemption was previously located in the National Measurement Regulations); <del>and</del>	AGL supports this change.
5.1.2 5.2 5.2.1 5.2.2 5.2.4 5.3	Minor changes	AGL supports this change.
6.1	<p><i>National Trade Measurement Regulations 2009, Regulation 5.6, “Exempt utility meters”:</i></p> <ul style="list-style-type: none"> <li>For the definition of utility meter in subsection 3(1) of the Act, the following classes of meters are exempted from the operation of <del>Part IV section 4A</del> of the Act: <ul style="list-style-type: none"> <li>(a) <a href="#">electricity meters installed before 1 January 2013;</a></li> <li><a href="#">electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 750 MWh of energy per year;</a></li> </ul> </li> </ul>	AGL supports this change.

Section	Description	Participant Comments
6.2 7 8.3 Appendix C	Minor changes	AGL supports this change.

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

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	AGL supports this change.

## 8. Questions on proposed changes

Heading	Participant Comments
<p>Do you support the proposals contained in this Issues Paper? If not, please specify areas in which your assessment differs (include ICF reference number), with supporting information.</p>	<p>AGL supports some but not all of the proposals – see comments above.</p>
<p>Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?</p>	<p>AGL has provided proposed drafting for the meter data collection obligation which it believes is more aligned with the original intent of the change.</p> <p>AGL does not support the move of connection information from NMI to meter, as it believes that this is very likely to lead to ambiguous or incorrect information being collected, which would wipe out the benefits of the proposed change.</p>
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>The main problems with the meter data collection as consulted on was the very high and unnecessary cost the proposal as drafted would have forced on customers and industry for no appreciable benefit.</p>
<p>With regards to the 'Redefinition of Connection Configuration' proposal (ICF_037), what standing data fields should be presented in the C7 Report, to enhance the report's useability?</p>	<p>The C7 report should reflect the Connection Configuration in MSATS. This value must be an attribute of the connection point and reflect where the supply is single, 2-phase or 3 Phase , low or high voltage.</p> <p>Additionally, all new data collected by the MS DR obligations should be made available to the new participant in the c7 or other relevant report.</p>

<b>Heading</b>	<b>Participant Comments</b>
Do you have any further questions or comments on the proposed changes?	No.
Please provide any feedback that closely relates to this consultation on the Procedures, but warrants further investigation. AEMO will review any such feedback after this consultation, in the context of another consultation, or the annual prioritisation process.	No further feedback at this time.