

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:** Alinta Energy*

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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> <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 tariff. 	<p>Alinta Energy supports what is being proposed, however we like to see 2.4.3 (b)(ii) modified so that there no confusion as to when reactive energy information needs to be collected and delivered.</p> <p>Suggested wording:</p> <p>(ii) application of a <i>reactive energy</i>-based <i>Network Tariff</i> or if required by FRMP in order to calculate the energy user’s bill.</p>
New clause 2.4.1(a)(ix)	Insert new clause:	Alinta Energy does not support the insertion of this new

Section	Description	Participant Comments
	<p>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.</p>	<p>clause into the MDP Metrology procedure.</p> <p>The roles and responsibilities of participants when this energy is detected is not well defined in the NER and supporting procedures.</p> <p>Alinta Energy would like to see the roles and responsibilities addressed at the same time as this obligation was placed on MDP's. We proposed that this change be held over until industry has had the opportunity to consider what changes need to be made to relevant regulatory frameworks to ensure it is clear who and how this energy is managed from a holistic point of view. This will include obligations to investigate, rectify and possibly prosecute in the event of illegal and unauthored activity.</p>
<p>Renumbered clauses</p>	<p>Clauses renumbered following above change.</p>	<p>No comment.</p>
<p>3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data</p>	<p>Insert new clause: (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.</p>	<p>Alinta Energy supports this change. We also acknowledge that over the Xmas and Easter long weekends that this obligation becomes a bit challenging, so we suggest the following rewording:</p> <p>(c) Each MDP must operate and maintain a process so that after five consecutive days where remote acquisition is unavailable, the MDP notifies the MC on the next business day.</p>

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) 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> <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>	Alinta Energy does not support the inclusion of these 2 new clauses with their current wording. We propose the following as an alternative for AEMO to consider: (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"> (i) within 15 business days, take the steps to have the missing data collected; (ii) have the metering installations communications system maintained to ensure ongoing data collection; and (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, (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

4. MSATS Procedures: Consumer 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>Alinta Energy does not support this proposed change.</p> <p>Alinta Energy is supportive of the gathering of connection configuration and believes that this information is very valuable and will significantly improve the efficiency of the market however we believe that the LNSP and ENM should be the entities primarily responsible for the provision of this information.</p> <p>Alinta Energy does not agree with the statement in the Issues Paper “The MSDR intends to enable the sharing of key information, to minimise wasted site visits by MPs. In the above example, the MP would not know if the existing metering installation is connected as single-phase or three-phase. Accordingly, the MP would be unable to appropriately quote, or know what meter to bring, without a site visit in advance. This inability makes the information in the field unreliable for market operations. Consequently, the LNSP will be obliged to maintain this information, for little benefit.”</p> <p>The LNSP’s and ENM’s are the entities that are responsible for approving the type of connection to the distribution be that HV or 3phase LV. In most instances this will be what the customer requires from a metering sense. Metering Providers do not install like for like metering at premises, they will make an assessment and install the most practical/efficient metering solution which in most cases will see the amalgamation of 3 single phase meters into 1 poly phase meter.</p>
<p>9.3.4(h)</p>	<p>Allows LNSPs to populate the Change Request with Connection Configuration information</p>	<p>Alinta Energy does not support this proposed change.</p>

Section	Description	Participant Comments
		Alinta Energy does not support this information being at the metering level as we believe it should be captured and maintained at the NMI level.
10.1.4(d) 10.2.4(d) 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	Alinta Energy does not support this proposed change. Alinta Energy does not support this information being captured at the metering level.
10.4.4(d) 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	Alinta Energy does not support this proposed change. Alinta Energy does not support this information being captured at the metering level.
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).	Alinta Energy does not support this proposed change. Alinta Energy does not support this information being captured at the metering level.
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	Alinta Energy does not support this proposed change. Alinta Energy does not support this information being captured at the metering level.

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.	Alinta Energy does not support this proposed change. Alinta Energy does not support this information being captured at the metering level.
Table 3 (CATS_M ETER_REG ISTER)	ConnectionConfiguration field to be updated as follows: MANDATORY where there is an installed meter Field to be provided by LNSP MPB	Alinta Energy does not support this proposed change. Alinta Energy does not support this information being captured at the metering level.

6. Guideline for Clarification of the National Measurement Act

Section	Description	Participant Comments
1.1	This is the Guideline for Clarification of the National Measurement Act made under clause 7.15 7.16.8 of the NER (Guideline). ... 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	Alinta Energy Supports these changes.

	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	Alinta Energy Supports these 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	Alinta Energy Supports these changes.
5.1.2 5.2 5.2.1 5.2.2 5.2.4 5.3	Minor changes	Alinta Energy Supports these changes.
6.1	<i>National Trade Measurement Regulations 2009, Regulation 5.6, “Exempt utility meters”:</i> <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: 	Alinta Energy Supports these changes.

	(a) electricity meters installed before 1 January 2013; 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	Alinta Energy Supports these changes.

7. Retail Electricity Market Procedures – Glossary and Framework

(This section was left out of the Participant Response Template, has been included for completeness)

Section	Description	Participant Comments
2.4	Deletion of clause and re-numbering remaining clauses.	Alinta Energy Supports these changes.
4.4.5	New Clause: 4.4.5 Guideline for Clarification of the National Measurement Act The Guideline for Clarification of the National Measurement Act is made in accordance with NER clause 7.16.8 and is a supporting document provided to clarify the requirements of the National Measurement Act in relation to its application on metering installations	Alinta Energy Supports these changes.

8. 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	Alinta Energy Supports these changes.

9. Questions on proposed changes

Heading	Participant Comments
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.	While Alinta Energy supports most of what is trying to be achieved with these proposals, we do not support how this is being proposed to be done. We have provided our comments in relevant tables above.
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?	Alinta Energy has provided commentary on alternate way for the objective to be achieved in the tables above.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Alinta Energy believe that there will be little to no challenges with a retailer adopting the proposed changes. We will leave it to other participants to assess their own impact.
With regards to the 'Redefinition of Connection Configuration' proposal (ICF_037), what standing data fields should be	Alinta Energy would like to see the C7 report reviewed to ensure that all the relevant

Heading	Participant Comments
presented in the C7 Report, to enhance the report's useability?	NMI and metering fields in MSATS are returned, this includes the new fields introduced in the MSDR.
Do you have any further questions or comments on the proposed changes?	No other comments at this time.
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 other feedback at this time.