

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Powermetric Metering

Submission Date: 22 April 2021

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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> <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> | Powermetric believe this sits within the current data management system and have no issues with this proposed 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 with remote acquisition</i>.</u></p> | Powermetric believe this sits within the current data |

| Section | Description | Participant Comments |
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| | | management system and have no issues with this proposed change. |
| 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 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> | Powermetric believe this sits within the current data management system and have no issues with this proposed change. |

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> | <p>Powermetric believe this sits within the current meter management process and have no issues with this proposed change.</p> <p>The proposed ICF_023 clauses are not practical and will introduce unnecessary cost on participants with little benefit.</p> <p>Focus should be on ensuring that data is not lost from a meter that cannot communicate and that manual collection frequency is reasonable. Powermetric therefore propose the suggest proposed clauses be replaced with:</p> <ul style="list-style-type: none"> (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, |

| Section | Description | Participant Comments |
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| | | (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 |
|--|---|---|
| 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. | Powermetric have no issue with this proposed change |
| 9.3.4(h) | Allows LNSPs to populate the Change Request with Connection Configuration information | Powermetric have no issue with this proposed change |

| 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. | Powermetric have no issue with this proposed change |
| 10.4.4(d) 10.5.4(d) | Adds obligation for MC to populate a Change Request with Connection Configuration. | Powermetric have no issue with this proposed change |
| 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). | Powermetric have no issue with this proposed change |
| Table 16-C | Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section. | Powermetric have no issue with this proposed change |

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. | Powermetric have no issue with this proposed change |
| Table 3 (CATS_M) | ConnectionConfiguration field to be updated as follows: MANDATORY where there is an installed meter | Powermetric have no issue with this proposed change |

| Section | Description | Participant Comments |
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| ETER_REG ISTER) | Field to be provided by LNSP MPB | |

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 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 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> | No comment |
| 3.1 3.2.1 3.2.2 | Minor changes | No comment |

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| 3.3 | | |
| 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"> (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; | No comment |
| 6.2 7 | Minor changes | |

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| 8.3 Appendix C | | |
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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 | No comment |

8. 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. | Powermetric support all proposed changes except for ICF_023. The proposed ICF_023 clauses are not practical and will introduce unnecessary cost on participants with little benefit. Focus should be on ensuring that data is not lost from a meter that cannot communicate and that manual collection frequency is reasonable. |
| Are there better options to accommodate the proposed change that better achieve the stated objectives? What are | See comments above. |

| Heading | Participant Comments |
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| the related pros and cons? How would they be implemented? | |
| What are the main challenges in adopting these proposed changes? How should these challenges be addressed? | See comments above. |
| 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? | The C7 report should contain this relevant Connection Configuration information. |
| 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. | |