

RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo 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>Red Energy and Lumo Energy (Red and Lumo) note the proposal.</p> <p>It is important that this proposal does not lead to any consequential amendments in the presentation of meter information in MSATS</p> <p>Should this occur, there will be flow on system and process impacts with no corresponding benefit to retailers or consumers.</p>
New clause 2.4.1(a)(ix)	<p>Insert new clause:</p> <p><u>Ensure that systems and processes are in place to detect energy data, at least every 20 business days, when the</u></p>	<p>Red and Lumo note the proposal and have no comment at this time.</p>

	<u>datastream is not active for a metering installation with remote acquisition.</u>	
Renumbered clauses	Clauses renumbered following above change.	Noted.
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>	Red and Lumo note the proposal and have no comment at this time.

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</u>	Red and Lumo oppose the introduction of the timeframes proposed by AEMO in the ICF released for consultation. The original ICF put forward and developed in consultation with the ERCF had a different set of timeframes for what is being proposed here. Noting that Red and Lumo support the intent of the clause, however, the timing obligations are adding unnecessary costs with no benefit. Ultimately, costs imposed on industry by AEMO are borne by consumers. As such, we urge AEMO to reconsider their proposal as outlined below.

	<p><u>actual metering data was collected when remote acquisition is not available.</u></p>	<p>In relation to 12.2(k): The original ERCF ICF draft proposed the period for the MC to act to be set at 15 days. This period was set to align with exemption processes, but also to allow the MC time to assess and monitor if the comms failure is due to a legitimate issue requiring a site visit or one that would self resolve - such as telco problems. This timeframe also allows time to:</p> <ul style="list-style-type: none"> ● Determine if the site had been de-energised by the network (allowing for the 5 days for period for MSATS to be updated); ● Schedule a visit and request a service order from a retailer; and ● And where relevant, allow for the retailer to issue an interruption notice to the customer in the event that repairs would require a power interruption (to minimise site visits and the impact on the customer). <p>However, the current drafting has reduced the period to 7 days. This barely allows time for the MC to determine if the meter has been de-energised by the network, as in other parts of the Procedures, they have 5 business days to provide an update to MSATS. This provides inadequate time to resolve the issue, manage the customer experience and expectations, let alone provide the relevant updates into MSATS.</p> <p>In relation to 12.2(i): The original ERCF ICF draft proposed for the MCs to obtain actual read data from the meter based on the amount of memory available. It was proposed that this occurred no less than on a quarterly basis, to ensure that data was used for quarterly billing processes. Red and Lumo support the original proposal to allow the MC/MP to manage site visits, after the initial investigation, in agreement and accommodating the needs of the retailer and their customer.</p> <p>AEMO’s updated proposal mandates that actual data is collected on site every 14 days, with no consideration of a customer’s expectations, retailer costs, nor the available memory in the meter. If AEMO wishes to have</p>
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		<p>manual actual reads this frequently for meters that are not capable of remote acquisition, AEMO should fund this data collection. This change will add significant costs to all consumers with no corresponding benefit.</p> <p>In our experience, approximately 50% of communication failures are the result of network disconnection, and the remainder rectified on the initial investigation. Therefore, the AEMO proposal would lead to scenarios where a site could require 25+ visits in a year, compared to the original ERCF ICF which would require 5 visits in a year. The operational costs to undertake at least 20 more visits than what is required far outweighs any benefit.</p> <p>Red and Lumo firmly believe that this will deteriorate competition for customers in remote and rural areas, and areas with poor communication. Smaller retailers will not be able to absorb costs of this magnitude and will either pass these onto customers for no benefit, or choose not to supply to customers in particular locations. This will leave bigger retailers such as Red and Lumo or the incumbent retailer (who has an obligation to supply) being left with a disproportionate set of costs and poor customer experience to manage.</p> <p>This does not meet the NEO nor the NERO.</p> <p>Red and Lumo strongly recommend that AEMO do not prescribe a timeframe in the Procedures and leave this to commercial agreements and/or customer expectations. If AEMO thinks that they <i>must</i> prescribe a timeframe, anything less than 4 months is excessive.</p>
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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.	Red and Lumo note the proposal and have no comment at this time.
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	Red and Lumo note the proposal and have no comment at this time.
10.1.4(d) 10.2.4(d) 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	Red and Lumo note the proposal and have no comment at this time.
10.4.4(d) 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	Red and Lumo note the proposal and have no comment at this time.
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>Red and Lumo support this change. Moving the Connection Configuration information to be aligned to each meter provides better visibility of the actual phases in use by each meter.</p> <p>Red and Lumo also see benefit in knowing both the phases available as well as the ones in use. This would allow for a more efficient and timely process when assessing whether a meter exchange is required or a meter reconfiguration when the requirement for a meter with more phases is needed at the</p>

		connection point. We propose for there to be an additional field to be implemented to complement the phases in use: Phases available.
Table 16-C	Table 16-C to be removed from NMI_DATA section and moved to METER REGISTER section.	See comments against the proposed change for: MSATS Procedures: CATS, 15.1.4(d) & 15.1.4(f).

5. Standing Data for MSATS (Standing Data document)

Section	Description	Participant Comments
Table 6 (CATS_NMI_DATA)	Change location of ConnectionConfiguration field to Meter Register table.	See comments against the proposed change for: MSATS Procedures: CATS, 15.1.4(d) & 15.1.4(f)
Table 3 (CATS_METER_REGISTER)	ConnectionConfiguration field to be updated as follows: MANDATORY where there is an installed meter Field to be provided by ENSP MPB	Red and Lumo note the proposal and have no comment at this time.

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

Section	Description	Participant Comments
Version and date	Document version 3.6 and effective date of 1 May 2022	Updates to this document, Glossary and Framework, are aligned to the changes proposed under references to National Measurement Act. The effective date of the changes to Guideline for Clarification of the National Measurement Act is 1 August 2021. However the changes to the Glossary and

		Framework are effective 1 May 2022. Red and Lumo propose for the two effective dates to be aligned - either 1 August 2021 or 1 May 2022.
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>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>	Red and Lumo note the proposal and have no comment at this time.
3.1 3.2.1 3.2.2 3.3	Minor changes	Red and Lumo note the proposal and have no comment at this time.
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	Red and Lumo note the proposal and have no comment at this time.
5.1.2 5.2 5.2.1 5.2.2 5.2.4	Minor changes	Red and Lumo note the proposal and have no comment at this time.

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: <p>(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;</p>	<p>Editing of the document has been incorrectly numbered and needs to be rectified as follows:</p> <ul style="list-style-type: none"> • <i>For the definition of utility meter in subsection 3(1) of the Act, the following classes of meters are exempted from the operation of section 4A of the Act:</i> <p><i>(ba) electricity meters installed before 1 January 2013;</i></p> <p><i>(b̄a) electricity meters installed on or after 1 January 2013, other than electricity meters that measure less than 750 MWh of energy per year;</i></p>
6.2 7 8.3 App C	Minor changes	Red and Lumo note the proposal and have no comment at this time.

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	Red and Lumo note the proposal and have no comment at this time.

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>Red and Lumo support the intent of the proposal of ICF_023 (Process when remote collection of metering data fails). However, we do not support the AEMO proposed timeframes. See comments against the proposed changes for: Metrology Procedure: Part A, 12.2 Metering Data Collection.</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>Red and Lumo support the proposed changes as presented in ICF_037 (Redefinition of 'Connection Configuration'). However, Red and Lumo see there is benefit in displaying both the phases in use as well as the phases available. See comments against the proposed change for: MSATS Procedures: CATS, 15.1.4(d) & 15.1.4(f).</p>