

July 2023 Retail Electricity Market Procedures Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft version of the *July 2023 REMP Consultation*.

2. Feedback on Net System Load Profile Methodology (ICF_072) discussion

Question	Participant Comments
<p>1. Do you agree that Option 1 best achieves the desired objectives and principles? If not, why?</p>	
<p>2. Do you believe an alternative methodology would better achieve the desired objectives and principles? Why? Please provide details of the alternative methodology.</p> <ul style="list-style-type: none"> • The selection of an alternative methodology would likely result in a delay to the longer-term methodology being implemented, as AEMO would need to develop, analyse and test this alternative. 	
<p>3. Do you agree that the preferred methodology should not be implemented prior to October 2024 and that with the</p>	

Question	Participant Comments
implementation of the new methodology should occur during a historically less volatile pricing period? If not, why?	

3. Feedback on Substitution Type review (ICF_054) discussion

Question	Participant Comments
1. Do you agree that the proposed changes, to the substitution types and reason codes, will achieve the desired objective? In not, why?	<p>PLUS ES supports the proposed changes as they will deliver significant industry efficiencies.</p> <p>We also note the following for consideration:</p> <ul style="list-style-type: none"> • The newly proposed Reason codes should have included a detailed description for completeness of review. • Acknowledge that the proposed reason codes can only be provided for remote communication meters, in most scenarios once the metering installation has been visited/investigated. That is, these codes will never be applied to automatic processes. They will only be applied under agreed substitutions. • The provisioning of marked up versions of the current associated procedures would have enabled a more efficient targeted review of the proposed items.
2. Which of the proposed implementation dates do you believe should be pursued, and why?	<p>PLUS ES supports an implementation date of 4 Nov 2024 to be pursued:</p> <ul style="list-style-type: none"> • An earlier implementation date will deliver the efficiencies outlined sooner.

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	<ul style="list-style-type: none"> It is our preference to have these changes implemented and processes bi-laterally agreed, where required, and stabilised before the commencement of smart meter acceleration program (proposed date 1 July 2025).

4. Feedback on Summation Metering Changes (ICF_073) discussion

Question	Participant Comments
<p>1. Do you agree with the proposed inclusion of the three summation arrangements? If not, why?</p>	<p>PLUS ES does not agree that the definition of the summation arrangements need to be as prescriptive as proposed in the CIP073_ MetA Summation Metering document. It has the potential to inadvertently and incorrectly include or exclude circumstances where summation metering should or shouldn't be applied.</p> <p>We have revised the proposed wording provided in CIP073 and included them at the end of this table, for consideration. (Blue font = insertions and Red font= deletions)</p> <p>Additionally, the proposed amendments of CIP073 were not included in the consultation paper. PLUS ES proposes for completeness, it should have, at a minimum, been referenced.</p>
<p>2. Do you believe that an alternative approach would better achieve the desired objective?</p>	<p>PLUS ES supports that an alternative approach would better achieve the desired objective.</p> <p>In principle, summation arrangements should be described as circumstances, where:</p> <ul style="list-style-type: none"> The location of metering, with respect to the operation of the electrical infrastructure, has significant impact on market settlement, or A physical restriction prevents the installation of a single set of current transformers over a single metering/connection point.

Question	Participant Comments
	<p>The three examples listed should be listed as examples that may fit into that description.</p> <p>Additionally, AEMO should consider developing a guideline to support the above assessment.</p>
<p>3. Is the summation method detailed enough or should it be more prescriptive?</p>	<p>PLUS ES proposes that the approved summation method should be described in terms of its ability to achieve the required overall error performance.</p> <p>For example, paralleling CTs doesn't work with unbalanced loads and mismatched ratios, where summation CTs are superior in this circumstance. The proposed wording, however, would preclude this approach.</p> <p>Additionally, multiple meters with an addition algorithm may also deliver a better accuracy result.</p>
<p>4. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.</p>	<p>PLUS ES believes that an effective date of the procedure, 13 May 2024, would allow sufficient timeframe to adhere to the changes.</p>
<p>5.1 Legacy Summation Arrangements</p>	<p>These provisions are included to support legacy arrangements for existing <u>summation metering installations</u> where allowed by Jurisdictional transitional arrangements in Chapter 44 <u>9</u> of the NER.</p> <p>(a) If summation <i>metering</i> is achieved by paralleling CT secondary circuits, the overall <i>metering installation</i> must meet the minimum overall error standards for a new <i>metering installation</i> under all <i>load</i> combinations of the individual CT secondaries.</p> <p>(b) If summation <i>metering</i> is achieved by the arithmetic sum of data registers or the accumulation of pulses, each individual <i>metering point</i> must meet the minimum standards for a new <i>metering installation</i> and the</p>

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	<p>MC must on request demonstrate that the summation techniques reliably and accurately transfer data.</p> <p>(c) CT secondary ies <u>circuits</u> can only be paralleled using appropriate arrangements of links <u>and, where applied, summation transformer terminals</u>; this must not be done at the <i>meter</i> terminals.</p> <p>(d) For type 2 metering installations only: Direct summation, in which secondary wiring from a multiple number of feeders is connected directly into the terminals of a meter, or summation CTs are permitted provided that the overall errors of the metering installation are considered.</p>
<p>5.2 New Metering Installation Summation Arrangements</p>	<p>Summation metering is only permitted for a single connection point <u>circumstances</u> where location of metering with respect to the operation of the electrical infrastructure has significant impact on market settlement due to the location of metering, or where a physical restriction prevents the installation of a single set of current transformers over a single connection point. as follows:</p> <p>(a) HV breaker and a half schemes</p> <p>(b) HV single transformer fed by multiple paralleled cables; this must not involve multiple feeders</p> <p>(c) Cross boundary supply single transformer with multiple LV secondary circuits</p> <p>(d) Any proposed summation metering arrangement <u>under (a), (b) and (c)</u> must be approved by AEMO before implementation.</p> <p><u>Note: Examples of circumstances considered for summation metering may include HV breaker-and-a-half schemes, HV single transformer fed by multiple paralleled cables, and cross boundary supplies with multiple LV secondary circuits.</u></p>

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5.3 Summation Method	<p>These provisions detail the summation method that can only be used for new summation metering installations described in 5.2.</p> <p>(a) Summation metering is achieved by paralleling CT secondary circuits, the overall metering installation must meet the minimum overall error standards for a new metering installation and under all load combinations of the individual CT secondary circuits.</p> <p>(b) CT secondary circuits can only be paralleled using appropriate arrangements of links and summation CTs where utilised, and not paralleled at; this must not be done at the meter terminals.</p> <p>(c) The use of additional summation CTs within the metering installation is not permitted.</p> <p>Note 1: Multiple CTs or CTs with different ratios are difficult to parallel directly – this circumstance better served with summation CTs.</p> <p>Note 2: Both summation methods have challenges with <i>demonstrating accuracy</i> performance in accordance with the NER.</p> <p>Note 3: Multiple meters (on auxiliary supplies, if required) can also generally achieve the same outcome and arguably more accurately than summation CTs or parallel CTs, albeit with the use of combining algorithms.</p> <p>Note 4: AEMO should have a guideline document to describe the various methods. If the proposed design is not in the guideline, then go to AEMO for approval. For example, the first three described would go in the guideline. The guideline should also consider the determination of overall errors.</p>

5. Feedback on NMI Discovery for MCs discussion

Question	Participant Comments
<p>1. Do you agree with the proposed change to the CATS Procedure? If not, why?</p>	<p>The Issue Paper has not clearly articulated the proposed change to the CATS procedure.</p> <p>If it is referencing the potential exception to these limitations, where in a single calendar day, following the use of MC NMI Discovery, the sequential action of nominating an MC occur in MSATS, PLUS ES provides the following feedback:</p> <ul style="list-style-type: none"> • Large customer agreements - requires an MC NMI discovery search to be able to confirm that all the customer NMIs are large, provide the customer an agreement, and then nominate as MC if the customer agrees. • The drafting, provisioning and acceptance of the agreement is not something that occurs or can be achieved within a single calendar day. • The MC NMI Discovery may be used in accordance with the proposed CATS changes and the NMI is verified as Small (which happens often). The MC cannot nominate themselves as MC. • The proposed actions will only support PLUS ES in a small volume of use cases. • The gap created is more prominent with small customers where the removal of MC access to NMI Standing Data has provided the MC/MP: <ul style="list-style-type: none"> ○ No pathway to get the information required – e.g. cross metering – MP/MC/FRMP of Meter B is not the MC/MP/FRMP of Meter A. The MC of Meter A has no rule enabled pathway to get the information required for Meter B to ensure a resolution especially where planned outages are required for rewiring. Or, ○ A dependency, for rule enable pathways, on other participants, to provide them the information (which may take up to 5 business days). Information which was previously available within 2-5 mins via the MC NMI Discovery capability.

Question	Participant Comments
<p>2. Do you believe that an alternative approach would better achieve the desired objective?</p>	<p>As noted above the issue is not limited to LARGE customers.</p> <p>If the scope of enabling the MC NMI Discovery is limited to LARGE customers, then AEMO must provide an alternative approach which does not constrain the use of MC NMI Discovery and nomination of MC to a single day.</p> <p>This potentially could be achieved by auditing requirements where the MC can verify the use of the MC NMI Discovery was for the purpose of the Large Customer. As ICF 005 noted, access to information to quote and verify LARGE customer sites is only available after the MC has been nominated in the role.</p> <p>However, the above does not resolve the operational inefficiencies and poor customer outcomes which the current rule constraints deliver for almost all customer sites (LARGE/SMALL). Extending MC access to NMI Standing Data where they are not the MC or ever have been nominated as MC to that site is critical.</p> <p>The use cases to qualify such access have existed also in the legacy metering space. The difference is that the LNSP and the MP were generally the same entity and the MP had access to the information. Not so, in the contestable world.</p> <p>It is evident that a rule change is required but the rule change process is lengthy. PLUS ES hopes that AEMO, the AEMC and the AER, develop and approve an interim measure to mitigate the current challenges, whilst more permanent determinations are considered and implemented. That is, measures which will enable the MC/MP continuous, seamless, and efficient resolution to their BAU tasks to mitigate increased costs and poor customer outcomes.</p>
<p>3. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.</p>	<p>The proposed scope of CATS Procedure changes has limited use cases.</p> <p>For the reasoning above, irrespective of the scope, PLUS ES would like to see reactivation of the MC NMI Discovery sooner than the 13 Dec 2023. The solution</p>

Question	Participant Comments
	is proven and PLUS ES hopes that reactivating the functionality should be as efficient as deactivating it.