FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Flow Power

Submission Date: 29 Aug 2019

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'Five-Minute Settlement Metering Procedure Changes – Package 2' Draft Procedures.

Please note, the change marked versions of the Draft Procedures highlights the changes required between the first stage Initial Draft Procedures and the second stage Draft Procedures.

The changes being proposed seek to enable the implementation of:

- The Five-Minute Settlement (5MS) Rule
- The Global Settlement (GS) Rule
- Changes to the delivery, format and content contained in the meter data files sent to AEMO.

2. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1	Requirements under National Measurement Act and Use of Standards	We suggest that requirements should mention that meters need to be 5-minute compliant and that any new/replacement meters after 1 Dec 2018 must be 5-minute compliant.
3.4	"x" values – Calculation and Use	For ACT we have specified if there is a variance. Annual consumption plus an allowance of 2%. Flow power requires confirmation that no other states have the 2% allowance except ACT?

Section	Description	Participant Comments
		Australian Capital Territory The volume threshold for a connection point must be determined from: (1) the annual consumption over the most recent 12-month period, (2) the annual consumption over the most recent 12-month period plus an allowance of 2%; or If there is an allowance for any other state can that be specified as well please.
12.3, 12.7	Provisions for non-contestable unmetered loads	We note that there is incorrect reference to the NER with respect to the data storage. This is dealt with 7.11.3 in the NER rather than 7.10 mentioned in the document.

3. Metrology Procedure: Part B

Section	Description	Participant Comments
12.3	Profile Area five-minute load profile calculation	The energy inflows are a sum of bulk supply or should it be GLOPOOL because LR will be replaced by GLOPOOL.

Section	Description	Participant Comments
12.4	Applying the five-minute profile to 15- minute and 30-minute metering data for a Profile Area	See we note that clause 12.4 provide guidance on the calculation on 5 - minute profile regarding the actual metering data but was silent on guidance related to UFE.
		We submit that AEMO should include guidance on the calculation of UFE to allow participants to setup their systems.
		In addition, we request confirmation that UFE will not have DLF or TLF included. Can that be specified more clearly.
13	Non-contestable unmetered loads	Noted.
Various	Inclusion of the word "affected"	Noted

4. MSATS Procedures: MDM Procedures

Section	Description	Participant Comments
3.2.15, 3.2.17	Unaccounted for energy (UFE)	Noted
5.2	MDP Obligations	Flow power understanding is that AEMO system will reject files with the same timestamp therefore we suggest that even if one interval in the read file is changed, the file should have a different timestamp as with 5-minute reads there will be 288 intervals. Because for our extremely large customers one interval can make a big \$ value difference, especially if it happens at the time of a high price event.

6	LOAD DATA – INTERVAL NMI DATASTREAM	Noted
9.11- 9.14	MDM RM Reports	Noted

5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
2.3	Local Network Service Provider	Noted
Various	Reference to NMI Procedures Appendix E	Noted
4.4	Use of LR/ENLR within this Procedure	Noted
4.10	NMI Classification Codes	Noted
4.12.2	Datastream Status Codes	Noted
4.13.1	Consequences of Allocating Certain Metering Installation Codes	Noted
5	MSATS REPORTS	Noted
Various	References to LR and ENLR	Noted
11, 13, 15, 16, 17, 20, 21, 22, 23,	Inclusion of NCONUML	Noted

24, 25, 26, 27, 30, 31, 32, 39, 40		
Various	Updated table references	Noted

6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
1.4	WIGS Codes and Rules for a Change Request	Noted
Various	Inclusion of "NREG" NMI Classification Code	Noted
Various	Inclusion of "BULK" NMI Classification Code	Noted
Various	Inclusion of "XBOUNDRY" NMI Classification Code	Noted
Various	Inclusion of "DWHOLSAL" NMI Classification Code	Noted
Various	Provisions for embedded network local retailers (ENLR)	Noted
Various	Removal of Local Retailer (LR) references	Noted

7. National Metering Identifier

Section	Description	Participant Comments
VRH	Effective date updated to 1 July 2021	Noted
Appendix E	Inclusion of appendix to better communicate NMI Classification and Role requirements	Noted
2.4	Allocation of NMIs for non-contestable unmetered loads	Noted
6	Changes to DATASTREAM SUFFIX	Noted
A.19, A.20	Non-Contestable Unmetered Load – One NMI With Multiple Devices	We suspect the section reference is missing as we are unable to locate it. As such we are unable to provide comments.

8. NEM RoLR Processes – Part A

Section	Description	Participant Comments
Various	Removal of first and/or second tier references	We note that in the index on page 4 points 12 & 13refer to term LR instead of ENLR. This needs to be changed.
Various	Provisions for ENLR	Noted

9. Service Level Procedure: Metering Data Provider Services

Section	Description	Participant Comments
2.4	Specific obligations for MDP - Category D	Our understanding is that MDP will be required to provide the files simultaneously to all the parties when PMD is raised. We suggest this to be a part of MDP obligations.
3.7	Metering Data Processing Requirements	Noted
3.10.2	Non-contestable Unmetered Load Calculation Methodologies and Agreed Loads	Noted
3.12.4	Delivery of Settlements Ready Data	Noted
3.12.5	Method of Delivery of Data	Noted
5	METER CHURN DATA MANAGEMENT	Noted

10. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description	Participant Comments
1.1	Purpose and scope	Noted
1.2	Definitions and interpretation	Noted

2	APPLICATION PROCESS	Noted
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11. Retail Electricity Market Glossary and Framework

S	ection	Description	Participant Comments
2	.7.7	Exemptions	Noted
5		GLOSSARY	Noted