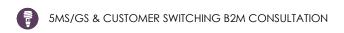


5MS/GS & CUSTOMER SWITCHING B2M CONSULTATION

ISSUES PAPER

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EXECUTIVE SUMMARY

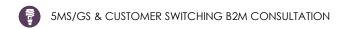
The publication of this Issues Paper commences the first stage of the Rules consultation process conducted by AEMO under the National Electricity Rules (NER) to consider proposed amendments to the following retail electricity market procedures (Procedures):

- Meter Data File Format Specification NEM12 & NEM13 (MDFF Specification).
- Metrology Procedure: Part B (Metrology Procedure).
- Market Settlements and Transfer Solution (MSATS) Procedures: CATS Procedure Principles and Obligations (CATS Procedure).
- MSATS Procedures MDM Procedure (MDM Procedure).

In summary, the key proposals involve changes to the Procedures which relate to Five Minute Settlement/Global Settlement (5MS/GS) and Customer Switching.

AEMO invites stakeholders to suggest alternative options where they do not agree that AEMO's proposals would achieve the relevant objectives. AEMO also asks stakeholders to identify any unintended adverse consequences of the proposed changes.

Stakeholders are invited to submit written responses on the issues and questions identified in this paper by 5.00 pm (Melbourne time) on 18 February 2021, in accordance with the Notice of First Stage of Consultation published with this Issues Paper.





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1. STAKEHOLDER CONSULTATION PROCESS

As required by the National Electricity Rules (NER), AEMO is consulting on amendments to the Procedures in accordance with the Rules consultation procedures in rule 8.9.

A glossary of terms used in this Issues Paper is at Appendix A.

AEMO's indicative timeline for this consultation is outlined below. Dates may be adjusted depending on the number and complexity of issues raised in submissions and any meetings with stakeholders.

Deliverable	Indicative date
Issues Paper published	12 January 2021
Submissions due on Issues Paper	18 February 2021
Draft Report published	18 March 2021
Submissions due on Draft Report	1 April 2021
Final Report published	17 May 2021

Prior to the submissions due date, stakeholders can request a meeting with AEMO to discuss the issues and proposed changes raised in this Issues Paper.



BACKGROUND

2.1 NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in NER Chapter 7, except for procedures under rule 7.17.

The procedures authorised by AEMO under Chapter 7 must be established and maintained by AEMO in accordance with the Rules consultation procedures.

2.2 Context for this consultation

AEMO engages through the Electricity Retail Consultative Forum (ERCF) on the Procedures. The ERCF provides a platform for interested parties to raise issues and propose changes to the Procedures, within the broader landscape of industry forums and groups: http://www.aemo.com.au/Stakeholder-Consultation/Industry-forums-and-working-groups.

In this context, AEMO has identified the proposed changes to the Procedures which relate to 5MS/GS and Customer Switching, as set out in Table 1.

Table 1 Proposed changes

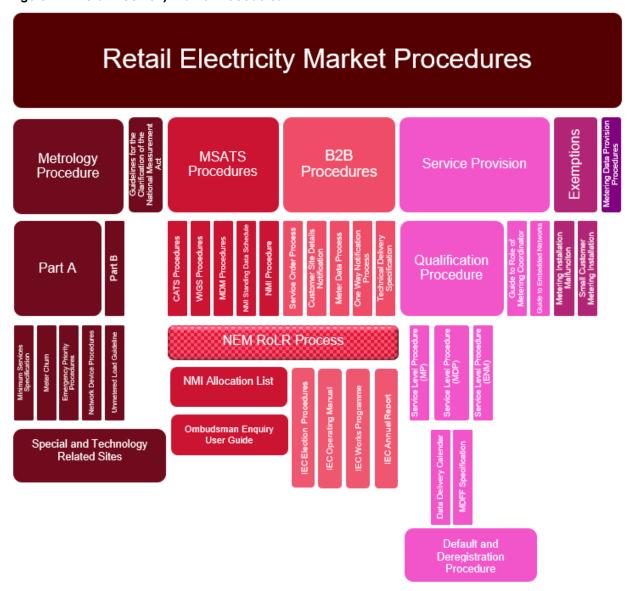
ID	Subject	Document changing
5MS/GS	Changes resulting from review of 5MS/GS	MDM Procedure Metrology Procedure MDFF Specification
Customer Switching	Changes resulting from review of Customer Switching Reversal Change Requests (CRs) CR1060 and CR1061	CATS Procedure MSATS Procedure: WIGS (version only)



2.2.1 Retail Electricity Market Procedures structure

The Procedures govern the operation of the retail market, as set out in Figure 1.

Figure 1 Retail Electricity Market Procedures



The Retail Electricity Market Supporting Documents (Supporting Documents) explain or provide additional information to enable Participants to fulfil their obligations under the NER, as set out in Figure 2.

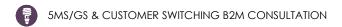
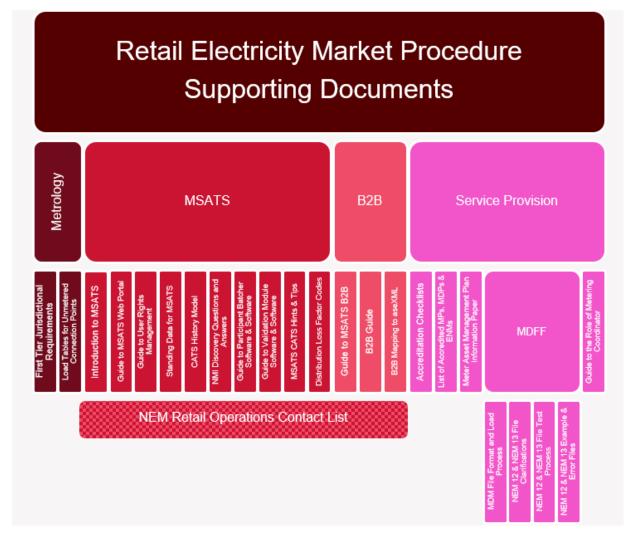




Figure 2 Supporting Documents





CHANGE PROPOSALS

3.1.1 **5MS/GS review**

The review undertaken during the 5MS/GS initiative identified that:

- The Net System Load Profile (NSLP) formulation in the Metrology Procedure did not include the Cross-Boundary energy volumes Distribution to Distribution Metered Energy (DDME) as inputs to a Profile Area.
- The MDM Procedure also requires the inclusion of Cross Boundary energy volumes as inputs to a Profile Area in the NSLP process steps.
- Controlled Load Profile (CLP) Weighting Factor is only defined for South Australia. The Metrology Procedure needs to include the Scaling Factor detail that is currently used for CLP calculation.

AEMO proposes that Metrology Procedure and MDM Procedure are updated to include Cross Boundary inflow in the NSLP formulation, to align with the actual calculation methodology.

The proposed change involves updating:

- The Metrology Procedure to reflect:
 - o Inclusion of Cross Boundary inflow to a Profile Area in NSLP calculation.
 - Detail of Scaling Factors that are currently used in CLP calculation.
- The MDM Procedure to reflect inclusion of Cross Boundary inflow to a Profile Area in NSLP calculation.

Previously, a change had been raised to remove the 'N' quality flag from the MDFF Specification. During August 2020, AEMO consulted on this change in the Metering ICF Package. AEMO determined that the 'N' quality flag will be removed.

Subsequently, Endeavour Energy suggested that the remaining wording which references the 'N' quality flag in clause 3.3.1(b) in the MDFF Specification:

- Appears to mandate the MDP to put in a value of zero, when no interval value exists.
- Could be misinterpreted to allow MDPs to default a substitution to a zero quantity, without following the processes identified in the Metrology Procedure.

Therefore, given that the quality flag is mandatory, the MDP could comply with clause 3.3.1(b) by flagging the zero data with an:

- 'A' flag this would be confusing, because it would now look like actual zero data, when in reality there is missing/null metering data; or
- 'S' flag or 'F' flag this would be confusing, because it would now look like the MDP had reason to believe that there is zero consumption, when in reality there is missing/null metering data, in which case a non-zero substitution could be more appropriate.

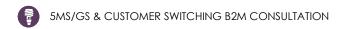
In this regard, Endeavour Energy queried whether AEMO intended to mandate the MDP to:

- Put in a value of zero, when no interval value exists; or
- Provide actual or substituted metering data, letting the MDP determine the appropriate value when substituting the metering data.

In response, AEMO noted the intent is to mandate the MDP to provide actual or substituted metering data, letting the MDP determine the appropriate value when substituting the metering data.

Accordingly, AEMO has proposed to change clause 3.3.1(b) to:

• Remove the mandate to put in a value of zero, when no interval value exists.





- Identify that null values are not allowed in the interval value field of the NEM12 file.
- Keep the existing restriction that null values are not allowed in the quantity field of the NEM13 file.

3.1.2 Customer Switching review

Customer Switching introduced two new change requests to enable participants to reverse transfers under certain circumstances. AEMO published the CATS Procedure without the requirement for a retailer to provide a proposed change date in the two CRs, because AEMO has established a process whereby MSATS will populate this date, based on the initial change request which was raised.

During testing, a defect was raised by the testing team, that a proposed change date was a mandatory field in the schema. The issue only occurs when producing an aseXML schema transaction for these change requests. AEMO notes that this is not a constraint associated with using the MSATS Browser.

Participants wishing to use the aseXML schema to raise these reversal change requests would receive a rejection from MSATS, as a proposed change date was not populated.

The proposed change involves updating the CATS Procedure to include a proposed change date for the CR1060 and CR1061. This proposed date will be an arbitrary date, as MSATS will still run the process to link the reversal change request with the initial change request. This process will complete the reversal change request with an actual change date based on the actual change date of the initial change request, to ensure that the reversal is completed using the correct dates.

Additionally, during testing, AEMO identified that the COM notifications for the CR1060 and CR 1061 for the New MC (RP) had not been applied in the Procedures, thereby creating a gap in role notifications in the reversal change requests. AEMO has proposed to add the stipulation that the New MC (RP) receives the COM notification for both the CR1060 and CR1061.

Questions

- Are there better options to accommodate the change proposals which better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?
- What are the main challenges in adopting these proposed changes? How should these challenges be addressed?



4. DRAFTING FOR PROPOSED CHANGES

To help stakeholders and other interested parties respond to this Issues Paper, AEMO has published the clean and change-marked draft versions of the following Procedures at http://aemo.com.au/Stakeholder-Consultation:

- Meter Data File Format Specification NEM12 & NEM13.
- Metrology Procedure: Part B.
- Market Settlements and Transfer Solution (MSATS) Procedures: CATS Procedure Principles and Obligations.
- MSATS Procedures MDM Procedure.
- MSATS Procedure: WIGS (version only).

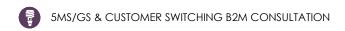


5. SUMMARY OF MATTERS FOR CONSULTATION

In summary, AEMO seeks comment and feedback on the following proposed changes to the Procedures:

ID	Subject	Document changing
5MS/GS	Changes resulting from review of 5MS/GS	MDM Procedure Metrology Procedure MDFF Specification
Customer Switching	Changes resulting from review of Customer Switching Reversal Change Requests (CRs) CR1060 and CR1061	CATS Procedure MSATS Procedure: WIGS (version only)

Submissions relating to the proposals discussed in this Issues Paper must be made in accordance with the Notice of First Stage of Consultation published with this Issues Paper, by 5.00 pm (Melbourne time) on 18 February 2021.





APPENDIX A - GLOSSARY

Term or acronym	Meaning
5MS	Five Minute Settlement
AER	Australian Energy Regulator
CATS	Consumer Administration and Transfer Solution, a part of MSATS.
CR	Change Request
DDME	Distribution to Distribution Metered Energy
FRMP	Financially Responsible Market Participant
GS	Global Settlement
ICF	Issue / Change Form
LNSP	Local Network Service Provider
MC	Metering Coordinator
MDP	Metering Data Provider
MP	Metering Provider
MPB	Metering Provider Category B
MSATS	Market Settlements and Transfer Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERL	National Energy Retail Law
NMI	National Metering Identifier
PoC	Power of Choice
RoLR	Retailer of Last Resort
RP	See MC
WIGS	Wholesale, Interconnector, Generator and Sample