RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

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***Submission Date**: 04/06/2021*

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the Retail Electricity Market Procedures March 2021 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
3.5 Specific Collection Process Requirements for Metering installations with Remote Acquisition of Metering Data	Insert new clause: (c) Each *MDP* must operate and maintain a process so that on the next *business day* after which a period of, at most, five consecutive *business days* where remote acquisition is unavailable, the *MDP* must notify the *MC* that *remote acquisition* is unavailable.	We agree that it is unreasonable to define an obligation to notify the MC on a non-business day. However, we note 'business days' is also added to the part describing the number of consecutive days where remote acquisition is unavailable. We believe that this has the unintended consequence of adding additional days for the notification when the unavailability of remote acquisition includes weekends and public holidays. For example, if remote acquisition starts to be unavailable on Wednesday, then: Thursday would be 1st business day Friday would be 2nd business day Saturday is not counted

Section	Description	Participant Comments
		Sunday is not counted Monday is 3rd business day Tuesday is 4th business day Wednesday is 5th business day Thursday is the day that the MDP must notify the MC In addition, this part of the clause does not impose any action on the MDP but is a trigger for an action, and is generally an automated BAU process that operates every day including non-business days. We suggest that 'business days' be removed from the number of consecutive days where remote acquisition is unavailable part, which would result in the following: If remote acquisition starts to be unavailable on Wednesday, then: Thursday would be 1st day Friday would be 2nd day Saturday would be 3rd day Sunday would be 4th day Monday would be 5th day Tuesday is the day that the MDP must notify the MC

Section	Description	Participant Comments
		Therefore, we suggest that clause 3.5.c be reworded to: Each MDP must operate and maintain a process so that on the next business day after which a period of, at most, five consecutive days where remote acquisition is unavailable, the MDP must notify the MC that remote acquisition is unavailable.

3. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)

Section	Description	Participant Comments
12.2 Metering Data Collection	Insert new clauses: (k) When the MC is informed of a metering data collection issue, the MC must: (i) within 15 business days, take the necessary steps to have the missing metering data collected; (ii) ensure that the metering installations' communications interface is maintained to facilitate ongoing collection of metering data; (iii) ensure that metering data is collected at a frequency that is within the energy data storage capacity of that metering	We note that clause 12.2.k.ii does not have a timeframe defined for the action. For clarity we suggest that a timeframe be defined – in line with the ICF for this change and clause 12.2.k.i we suggest that this timeframe be 15 business days. Therefore, we suggest clause 12.2.k.ii be reworded to:

Section	Description	Participant Comments
	installation such that the metering data collection process prevents the loss of actual metering data; and (iv) ensure that, irrespective of the energy storage capacity of the metering installation, the metering installation reading frequency must not exceed three months since the last actual read was undertaken.	within 15 business days, ensure that the metering installations' communications interface is maintained to facilitate ongoing collection of metering data;

4. Guideline for Clarification of the National Measurement Act

Section	Description	Participant Comments

5. MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS)

Section	Description	Participant Comments

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

Section	Description	Participant Comments

7. Standing Data for MSATS (Standing Data document)

Section	Description	Participant Comments
Table 3 (CATS_METER_REGISTER)	ConnectionConfiguration field to be updated as follows: Two-character code to denote information about the configuration of the connection point. First Character = Connection Type H = *High voltage* (as defined in the NER) L = Low voltage (lower than the threshold defined for *high voltage* in the NER) Second Character A = single phase supply/single phase metering B = 2 phase supply/one phase with single phase meter C = 2 phase supply/two phases each with single phase metering D = 2 phase supply/ two phase metering	The draft report explained that the second character of the Connection Configuration field is to provide information on 'phases available' as well as 'phases in use'. We note that most of the submissions requesting for 'phases available' is for the following: • The LNSP is responsible for the connection to the network and therefore would have the phases available information and whether the connection is HV or LV (Alinta Energy, Vector Metering, PLUS ES) • Metering Providers may not install a like for like meter and may decide to install different meter arrangements, eg replace 3 single phase meters with 1 three phase meter (Alinta Energy, Red Energy and Lumo Energy) • Metering Providers want to know the phases available at a greenfield site so that they can determine the required metering arrangement at a greenfield site (PLUS ES)

Section	Description	Participant Comments
	E = 3 phase supply/one phase with single phase metering F = 3 phase supply/two phases each with single phase metering G = 3 phase supply/two phase metering H= 3 phase supply/three phases each with single phase metering J = 3 phase supply/three phase metering K = SWER MANDATORY where there is an installed meter Field to be provided by ~~LNSP~~ MPB	We wish to highlight that AEMO and industry considered both 'phases available' and 'phases in use' during the MSATS Standing Data Review workshop and consultation and decided to only have 'phases in use' On page 17 of the MSATS Standing Data Review Issues Paper, AEMO stated: *Participants were asked whether the second character (which referred to "Phases Available" in the material distributed in advance of the pre-consultation) should be split into two characters expressing "phases supplied" and "phases in use" separately. Participants expressed strong support for not separating Character 2 in this way. As such, AEMO proposes that Character 2 not be split and only refer to "phases in use".* We also note that the ICF for this change was to make it clearer that the information to be provided for this field is 'phases in use', as per the name of the second character, and not 'phases available'. During the Electricity Retail Consultative Forum (ERCF) meetings, where the ICF and CIP for this change was presented to AEMO and industry, there was no request to consider 'phases available', or any issue raised that would warrant a reconsideration of 'phases available'. We are therefore very concerned about AEMO reintroducing an obligation to provide 'phases available' when this has been considered and ruled out, is not aligned with the intent of the ICF and industry was given ample opportunity to raise any concerns about the ICF. We suggest that participants who want to reintroduce 'phases available' to raise an ICF so that the proposed change can be considered in full, including any adverse impacts it may introduce.

Section	Description	Participant Comments
		We note that the intent of this new field is to share key information to allow metering providers to better prepare appropriate resources, including metering equipment, and to minimise wasted site visits. We support this intent because it would allow industry processes to be more efficient and ultimately deliver a better customer experience, however the obligation to provide these key information comes at a cost and therefore the benefit of the obligation must outweigh the cost. We note that the general arrangement is that the service mains connects the DNSP's network to the connection point (this is installed by the DNSP or the ASP in NSW) and the consumer mains connects the connection point to the metering installation (this is installed by the customer's electrician). Given that the Metering Provider is responsible for the metering installation we believe that they would be more interested in the 'phases available' at the metering installation, as opposed to the connection point. We wish to highlight that the number of phases at the connection point may not be the same number of phases at the metering installation - for example, an office building can have a three phase service main that is then split into single phase consumer mains to the metering installation for each of the office suite (with each of these office suites having their own NMI). For a greenfield scenario the customer or their electrician would be working closely with the Metering Provider or with their Retailer, who would then instruct the Metering Provider to install the meter – either way the number of phases at the metering installation will be communicated by the electrician who installed the consumer mains to the metering installation.

Section	Description	Participant Comments
		This means obligating the DNSP to provide 'phases available' at the connection point will provide minimal benefit and could cause confusion, especially given that the Metering Provider already have avenues to obtain the 'phases available' at the metering installation via the customer's electrician. Should AEMO include 'phases available' into this field then it should be made clear that this is the number of phases available at the metering installation, and given that the DNSP may not be aware of this information and the Metering Provider will become aware of this information during the course of their metering installation work, we suggest that the Metering Provider be responsible for providing this information. In addition, it would be too costly for the DNSP to perform field audits to collect this information for existing regulated metering installations, therefore we suggest that a value of 'unknown' be made available for the initial data population. Although AEMO has not provided a description of what is the information after the forward slash, it looks like it is the 'phases in use' and the 'phases of the metering equipment in use'. We believe that this proposal is adding additional complexities with little benefit. Firstly, it does not cover all the scenarios - for example there is not a value that covers the scenario for 1 three phase meter installed for the general supply and 1 single phase meter installed for controlled load. However, if the allowable values were to be expanded to cover all possible scenarios then it will be a lengthy and complex listing. We suggest that this be kept simple and that AEMO maintain the values as defined in the Issues Paper and that AEMO make it clearer what this information represent. Given

Section	Description	Participant Comments
		that AEMO has located this field at the meter level we suggest that AEMO makes it clear that this information represents the phases of that meter. We note the comments from some participants that Metering Providers may not install a like for like meter and may decide to install different meter arrangements – we believe that there is sufficient information that will allow Metering Providers to make that decision. For example, 3 single phase meters with the same network tariff would indicate that they could replace these meters with 1 three phase meter. We also note that some participants have suggested that this field be located within the NMI table and to obligate the LNSP to maintain it. We disagree with this proposal, especially obligating the LNSP to maintain this field, because it effectively means no change and therefore does not address the issues identified in the ICF. During the Electricity Retail Consultative Forum (ERCF) meetings, where the ICF and CIP for this change was presented to AEMO and industry, there was no objections making the MPB responsible for this field. We have provided further information above on why the MPB should be responsible for maintaining this field. In summary, below is our feedback: • Phases available ○ We do not support adding 'phases available'. We suggest that this be removed. Proponents who strongly support this should

Section	Description	Participant Comments
		raise an ICF so that it can be fully considered via the appropriate industry change process ○ If 'phases available' is to be added then it should be made clear that this is at the metering installation and that the MPB be responsible for this information. In addition a value of 'unknown' should be allowed. • Phases in use ○ We do not support adding 'phases in use' and the 'phases of the metering equipment in use' as suggested by the draft determination. We suggest that this be removed and what was proposed in the issues paper be re-instated with clearer definition of what this information represents ○ If 'phases in use' and the 'phases of the metering equipment in use', as suggested by the draft determination, is to be added then it should be expanded to include all possible scenarios • Better clarity of this field ○ It should be made clearer that this field pertains to the metering installation, as opposed to the connection point ○ It should be made clearer what the information in the second character represents

Section	Description	Participant Comments
		○ Example scenarios and expected values should be provided in section 13 and 14 of the document • Which participant to maintain ○ We do not support obligating the LNSP to maintain this field ○ We believe it is more appropriate for the MPB to maintain this field Therefore, we suggest that this field be defined as: Two-character code to denote information about the metering installation. First Character = Connection voltage H = High voltage (as defined in the NER) L = Low voltage (lower than the threshold defined for high voltage in the NER) Second Character = Phases in use by the meter 1 = Single Phase 2 = Two-Phase 3 = Three-Phase

Section	Description	Participant Comments
		Mandatory where there is an installed meter Field to be provided by MPB

8. Questions on proposed changes

Heading	Participant Comments
With regards to ICF_037 Connection Configuration, do you consider that the field would be better split to allow the LNSP to provide the expected supply connection to the site and the MPB to provide the supply at the metering level?	We disagree with obligating the LNSP to provide 'phases available' at the connection point for the reasons provided above. Proponents who strongly support this should raise an ICF so that it can be fully considered via the appropriate industry change process. If 'phases available' at the connection point is to be added then a value of 'unknown' should be allowed because it would be too costly for the LNSP to perform field audits to collect this information for existing connection points.