RETAIL ELECTRICITY MARKET PROCEDURES MARCH 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Vector Metering*

***Submission Date**: 4 June 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
2.4.3 Reactive Energy	Amend the wording to read: (a) Subject to paragraph (b), where the *metering installation* is configured to measure *reactive energy*, the MDP must store this *metering data* with the *metering data* in respect of *active energy* in the *metering data services database*. (b) The *MDP* is not subject to the storage requirement in paragraph (a), if the *metering data* in respect of *reactive energy* as measured by a Type 4 *small customer*, type 5 or VICAMI *metering installation* is not required for the current purposes of either: (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 *reactive energy*-based network tariff or if required by the FRMP in order to calculate the energy user's bill.	Agreed
New clause	Insert new clause:	Agree

Section	Description	Participant Comments
2.4.1(a)(ix)	Ensure that systems and processes are in place to detect *energy data*, at least every 20 business days, when the datastream is not active for a *metering installation* with *remote acquisition*.	
Renumbered clauses	Clauses renumbered following above change.	
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.	Agree

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	Agree with change.

Section	Description	Participant Comments
	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 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.	

5. 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.	Vector Metering does not support the change to the party that is responsible for the maintaining the Connection Configuration field. This should remain with the LNSP and ENM. This field should reflect the supply established by the LNSP (or in the case of NSW the

Section	Description	Participant Comments
		ASP) at the connection point (NMI), as was agreed during the MSDR consultation. LNSP's approve the type of supply as part of the 'approval to connect' process. This information can be used by the LNSP to populate this field in MSATS. Obligations should allow the NMI to be created with a 'unknown' value while the site is greenfield but once the site becomes 'A'ctive ConnectionConfiguration must be populated with the values agreed in the MSDR eg. Character 1 = 'H' or 'L', Character 2 = 1,2 or 3. Refer to table 7 below for more context.
9.3.4(h)	Allows LNSPs to populate the Change Request with Connection Configuration information	This change should be reverted. Obligations to update Connection Configuration should remain with the LNSP and ENM, and the field should remain on the CATS_NMI_DATA table in MSATS.
10.1.4(d); 10.2.4(d); 10.3.4(d)	Adds obligation for MPB to populate a Change Request with Connection Configuration.	This change should be reverted. This field should be at a NMI level, not the meter register level as the ConnectionConfiguration reflects details of the supply connection to the NMI. Obligations to update Connection Configuration should remain with the LNSP and ENM, and the field should remain on the CATS_NMI_DATA table in MSATS as agreed during the MSDR consultation.
10.4.4(d); 10.5.4(d)	Adds obligation for MC to populate a Change Request with Connection Configuration.	This change should be reverted.
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).	This change should be reverted. This field should be at a NMI level, not the meter register level.
Table 16-C	Table 16-C to be removed from NMI_DATA	This change should be reverted. This field should be at a NMI level, not the meter

Section	Description	Participant Comments
	section and moved to METER REGISTER section.	register

7. 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.	This change should be reverted. This field should be at a NMI level, not the meter register.
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	Vector Metering acknowledges that the proposed changes to the configuration field were to meet the requirements of ICF 37, which was to make the MP responsible for maintaining the information in this field, and as a consequence the field has been moved from the NMI level to the Meter level. This has introduced a lack of clarity on what this field is supposed to represent, as it will be appearing against every meter installed at the site, as well introducing a high degree of complexity as drafting proposes that the field now captures metering arrangements in addition to connection arrangements. The proposed codes for the second charater (A-J) are incomplete as there are legitimate situations where a multiphase site will have combinations of both 2 or 3 phase meters and single phase meters present. The proposed codes would, at least, need to be expanded to cover these scenarios if industry were to progress with this approach. We question the value that this additional complexity brings. Instead, we propose reverting back to the simplicity of the original intent of the ConnectionConfigration field as defined in the MSDR consultation, which was

Section	Description	Participant Comments
	phase metering D = 2 phase supply/ two phase metering 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	simply to reflect the details of the supply to the NMI, established by the Network, and that this field is the responsibility of the LNSP to maintain. We recommend that drafting be added to the procedures to clarify the use of this field, including that the second character reflects the number of active phases connected to the NMI (not the premise), irrespective of existing metering arrangements. This would result in the 2nd character of this field being set to one of 1,2 or 3.

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?	Refer to response in table 7. We support reversion back to the original intent of the MSDR consultation and that ConfigurationConnection reflect details of the supply to the NMI that has been established by the Network or the Networks agent. This is the useful information that can be used by Metering Providers in determining the type of job, the potential metering options and

Heading	Participant Comments
	the expect length of visit, and whether a pre-visit maybe required. This information is not readily available in MSATS today. We believe Networks do have (or should have) this information, as they are responsible for controlling connections to their network. We have heard some comments that this information isn't available when the NMI is created (Greenfield site) which we accept however, in this case the code could be set to 'UNKNOWN' with validation put in place to ensure that when a NMI becomes 'A'ctive is must have a relevant connection codes. At this stage of the consultation we don't support splitting the field into two although we do see that a field at the meter level to indicate that the meter is single or 3 phase may have some merit. Currently MP's who want this information must rely on looking at the meter manufacturers make and model information to determine this, which in turn, requires access to information about all other MP's (LNSP and Contestable) meter manifests. Determining whether this field should be introduced (or not), should be progressed through the standard ICF process via the ERCF.