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FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE

Participant: AusNet Services

Submission Date: 21 December 2018

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the ‘Five-Minute Settlement Metering Procedure Changes – Package 1’ consultation.

The changes being proposed are as a result of the Australian Energy Market Commission making a final rule to align operational dispatch and financial settlement at five minutes, starting 1 July 2021.

The Rule change requires the collection, storage and delivery of revenue metering data based on five-minute intervals for use in energy settlement, network and retail billing.

2. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
4.4.4	Removal of NEM12 & NEM13 File Clarifications	
5	Addition of various glossary items, including those from the ‘Meter Data Provision Procedure’	<p>The alteration of the definition of Maximum Demand has a material impact on the obligations in the MDPP. The definition of demand has changed to 5 minute. AusNet Services considers that the most relevant maximum demand is the demand measured over a 30 minute period. Generally, the over-heating impacts on network assets are smoothed over by the thermal mass of equipment.</p> <p>Our AER approved revenue is based on maximum demand calculated over</p>

	a 30 minute. Hence, we recommend changes that establish, where the customer is being billed on 30 minute demand, only 30 minute demand data needs to be provided.
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3. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	
1.2.1	Glossary removed and now included in the Retail Electricity Market Procedures – Glossary and Framework document	<p>The alteration of the definition of Maximum Demand has a material impact on the obligations in the MDPP. The definition of demand has changed to 5 minute. AusNet Services considers that the most relevant maximum demand is the demand measured over a 30 minute period. Generally, the over-heating impacts on network assets are smoothed over by the thermal mass of equipment.</p> <p>Our AER approved revenue is based on maximum demand calculated over a 30 minute. Hence, we recommend changes that establish, where the customer is being billed on 30 minute demand, only 30 minute demand data needs to be provided.</p>

Section	Description	Participant Comments
1.2.2	Interpretation section removed from the document	
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	

4. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
<p>Profiling 15 and 30-minute meter reads to 5-minute trading intervals</p> <ul style="list-style-type: none"> • What is your view on the proposed profiling approach for 15 and 30-minute non-controlled load meter reads and why? 	<p>We submit no feedback in relation to controlled load meter reads, that are not profiled in Victoria.</p>
<ul style="list-style-type: none"> • What is your view on the proposed profiling approach for 30-minute controlled load meter reads and why? 	<p>We submit no feedback in relation to controlled load meter reads, that are not profiled in Victoria</p>
<ul style="list-style-type: none"> • Are there better profiling options to accommodate 5MS, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented? 	<p>We submit no feedback in relation to controlled load meter reads, that are not profiled in Victoria</p>
<p>Meter Data Delivery to AEMO</p>	

Heading	Participant Comments
<ul style="list-style-type: none"> What are your views on AEMO transitioning to MDFF and why? 	<p>AusNet Services supports a staged transition to MDFF. In relation to this matter, we have previously provided advice to the 5ms High Level Impact Assessment. We note, AEMO is seeking to retire the MDMT files by July 2023 to gain greater insight into embedded generation by receiving metering data at the register level (i.e. b1, e1). The richness of this data would be helpful in wholesale forecasting.</p> <p>However, we are concerned by the impact and cost on participants of this requirement to update register level suffixes every NMI in MSATS to identify this data. There is potential risk to market settlements errors in populating or interpreting this more detailed data.</p> <p>These risks can be circumvented if AEMO decides to receive the net meter data in the MDFF file (as is currently allowed for), along with the register level metering data. This would avoid the need bulk updates to MSATS and transition market settlements from a tried and tested, robust data source at the NMI level. Under the current arrangements nothing prevents AEMO from loading the register level data (i.e. e1 and b1 data streams) in the MDFF files, for example into a “data lake”, for the purpose of DER forecasting. AEMO could then also validate against the net data stream. With this approach the retirement of the MDMT files will be non-controversial to participants and participants would not have to needlessly invest in bulk MSATS data conversions and amendments to CATS transaction processing. We note that profiling 30 minute metering data to 5 minute metering data is easier at the net NMI level as compared to at the register level.</p>
<ul style="list-style-type: none"> What are your views on AEMO supporting the reception of register level meter data and why? 	<p>AusNet Services recommends that Registered Participants are able to provide register level meter data and net NMI level data with the MDFF file. AEMO could continue to settle the market with net NMI level data. This avoids risk to market settlements and a costly update of all NMIs within MSATS.</p>
<ul style="list-style-type: none"> What are your views on MDPs sending the same files 	<p>We support this approach, for the above reasons.</p>

Heading	Participant Comments
<p>to both market participants and AEMO, energy and non-energy, and why?</p> <ul style="list-style-type: none">• What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	<p>Avoiding the need to update MSATS to include meter register level data for every NMI.</p>