

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

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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. Metrology Procedure: Part A

Section	Description	Participant Comments
3.2	A type 4A or 5 metering installation must have an optical port that meets the AS 1284.10.2 or AS 62056.21 or a computer serial port to facilitate downloading of 90 days of interval energy data for each Datastream associated with the metering installation in 90 seconds or less.	While we recognise the potential value of the provision of datastream information we are concerned that the procedure as drafted has the potential to require a significant reconfiguration of a large number of existing Type 4A and 5 meters at a significant cost and with minimal benefits to consumers given such meters are obsolete. Retrospective application of this requirement to existing but obsolete meters would be inconsistent with the NEO.
3.5	Jurisdictional Update	Support
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5	Trading Intervals are defined in the NER and these procedures cannot override those definitions. In any event this attempt at clarifying when trading intervals

Section	Description	Participant Comments
	minutes thereafter.	should end is confusing and likely to mislead.
6	Jurisdictional Update	Support
7	Jurisdictional Update	Support
9.3	Jurisdictional Update	Support
12.2	Jurisdictional Update	Support
12.4	Jurisdictional Update	Support
12.5	To validate that all metering data stored in the metering data services database is consistent with the energy data stored in the metering installation or the Physical Inventory (as applicable),	<p>This should read “To validate that all metering data stored in the metering data services database is appropriately consistent with the energy data stored in the metering installation or the Physical Inventory (as applicable)...”</p> <p>The words as drafted would imply 100% accuracy which is not the intent.</p>

3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.3	Jurisdictional Update	Support

Section	Description	Participant Comments
2.4	Change to 'F' Metering Data Quality Flag	Support
2.6	Page number links replaced with section links	Support
3.3.8	Change to Type 18 – Alternative wording	No Response
3.3.11	Addition of Type 21 - Five-minute Conversion No Historical Data	Has consideration been given to allowing profiling historical data on average system profile (whether on a regional, LNSP or NSLP basis) rather than a straight average?
4.3.3	Changes to Type 53 - Revision of Substituted Metering Data	Support (subject to comment in Section 7 of this response regarding Embedded Networks)
4.3.9	Addition of Type 59 – Five-minute Conversion No Historical Data	Has consideration been given to allowing profiling historical data on average system profile (whether on a regional, LNSP or NSLP basis) rather than a straight average?
11.2.1	Update to section reference to Metrology Procedure: Part A	No response
11.2.2	Update to section reference to Metrology Procedure: Part A	No response
11.2.3	Update to section reference to Metrology Procedure: Part A	No response
11.3.1	Update to section reference to Metrology Procedure: Part A	No response

Section	Description	Participant Comments
	'Half hourly' reference updated to 'Interval'	
11.3.2	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	No response
11.4	Update to section reference to Metrology Procedure: Part A 'Half hourly' reference in formulas updated to 'TI' 'Half hourly' reference updated to 'Five minute' Updates made to formulas	There are many references to load in this procedure when in fact the reference is intended to apply load and generation. Consideration should be given to either changing the reference or changing the definition of load for the purposes of the procedure.
11.5	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Support
11.6	Change end dates from '23:30' to '23:55'	Support
12	New section added to detail the conversion of interval metering data, previous section 12, and following section numbering, have been changed due to this insertion	Support

Section	Description	Participant Comments
13.1.4	Update to section references	Support
13.2.2	Update to section reference to Metrology Procedure: Part A	Support
13.2.4	Update to section references Update to formulas	Support
13.2.5	Update to formulas	Support
13.2.6	Update to section references Update to formulas	Support
13.3	Update to section references	Support
13.3.2	Update to section reference to Metrology Procedure: Part A	Support
13.4	Update to section reference	Support
13.5.2	Update to section reference to Metrology Procedure: Part A	Support
13.5.4	Update to section reference Update to formulas	Support

Section	Description	Participant Comments
13.5.5	Update to formulas	Support
14.1	Update to section reference	Support
14.3	Update to section reference	Support

4. Meter Data File Format (MDFF) Specification NEM12 & NEM13

Section	Description	Participant Comments
3.3.3	Included references to five-minute interval metering data	Support
4.3	NMI data details record (200) - Added '5' to the Interval Length field Definition	Support
Appendix H	Section added to include five-minute meter data file example	Suggest sample data H9 be more reflective of likely data i.e. samples vary between intervals as per sample H6.

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
2.6.3	Update to TI	Support
4.4.4	Removal of NEM12 & NEM13 File Clarifications	Support
5	Updates to various Glossary items	<p>Support subject to a question relating to the definition of Generation.</p> <p>As this definition will now apply to all Retail Market procedures (including WIGS) it would appear to define generation for the purposes of the WIGs procedure as being limited to <i>energy generated by the retail customers</i> which is entirely inconsistent with the purpose and scope of the WIGs procedures. This is likely to create confusion and make the procedures unintelligible for a range of participants (not just generators but also Small Generation Aggregators).</p>

6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	We query whether the reference in this clause should be to Retailers, DNSPs, Exempt EN Service Providers and ENMs given that the clauses referenced specifically deal with these four parties.

Section	Description	Participant Comments
1.2.1	Various updates	Support
1.2.2	Interpretation section removed from the document	Support
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	Support
2.3	Update to section (d)	No Response
3.4	Removal of 'single'	Support
4.1	Change to character length	Support

7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	As discussed above we believe that profiling should be easy to achieve and should be preferred over straight line interpolation.
Meter Data Delivery to AEMO	We are supportive of AEMO being able to receive additional metering (register level and non-energy) data provided that it does not impose significant additional obligations on Participants

Heading	Participant Comments
	<p>(e.g. should be optional) and it does not result in significant changes to AEMO's core systems.</p> <p>Consequently we are comfortable with the option of provision of non-energy data and the provision of register level data if AEMO continues to provide participants with NET data (whether provided directly from the MDP or calculated by AEMO from register level data).</p>
Embedded Networks	<p>Throughout these documents there is an assumption that all customers are connected to a DNSP and have a direct arrangement to a Retailer. In practice, many customers are now connected to embedded networks and therefore this assumption does not hold true.</p> <p>There needs to be a review of the documents to ensure that they properly reflect the operation of the market through embedded network connections.</p>