

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE

Participant: Momentum Energy

Submission Date: 15th February 2019

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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.	Agree to the proposed update
3.5	Jurisdictional Update	
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter.	Agree

Section	Description	Participant Comments
6	Jurisdictional Update [Embedded Networks]	<p>Momentum’s response is in relation to AEMO’s response detailed in Table 1 of the draft determination for Package 1 consultation:</p> <p>Section 6 requires the MC to ensure that interval metering is in place for child and parent connection points, the section does not require the MC to change a meter at a connection point where it is not responsible.</p> <p>How and when does the MC for the Child NMI communicate to the MC of the parent NMI about the requirement for an interval meter?</p> <p>Is there an expectation the ENO or EENSP would foot the bill for the new interval meter installation?</p> <p>We understand the clause is obsolete for Victoria but still effective in SA. This is a timely opportunity to assess the validity of the clause for SA and remove entirely when approval is granted by the SA jurisdiction?</p>
7	Jurisdictional Update	<p>Victoria – Agree to the deletion based on the stated treatment of new and replacement meters under 5 minute settlement (no new type 6 meters are expected to be installed)</p> <p>NSW –agree to the insertion of meter type 4A and deletion/ removal of Meter Installation type 5</p> <p>(4) The MC must ensureis settled <i>market on the basis of a metering</i></p>

Section	Description	Participant Comments
		<p><i>installation type 6.</i></p> <p><i>Suggest insertion of the word 'in the' to the statement:</i></p> <p><i>The MC must ensure that the energy measured by a meter, which is a sample interval meter installed for the purposes of calculating a CLP, is settled in the market on the basis of a metering installation type 6</i></p> <hr/> <p>South Australia - Agree</p> <hr/> <p>Queensland – Minor correction for the new (43)</p> <p>Remove one of the character 'a'</p> <p>The metering coordinator must ensure that the energy measured by a sample Interval Meter installed for the purposes of calculating the CLP is settled in the market on the basis of a type 6 metering installation.</p> <hr/> <p>Tasmania – No comments</p>
9.3	Jurisdictional Update	
12.2	Jurisdictional Update	<p>12.2(b) Jurisdiction NSW</p> <p>Please refer to Section 7 Reversion of Metering Installation types for the NSW Jurisdiction (1), AEMO has commented that it will seek approval from COAG to remove reference to Metering Installation type 5.</p> <p>12.2(b) / Jurisdiction NSW/ (1) has had the narrative amended for type 5</p>

Section	Description	Participant Comments
		<p>meters. Suggests the following for clarity:</p> <p><i>(1) Subject to section 7[NSW](4), the type 5 accumulation boundary is between 100 and 160 MWh per annum for type 5 meters installed prior to 1 December 2017.</i></p>
12.4	Jurisdictional Update	Agree with request for clauses 12.4 © & 12.4(d) to be identified as 12.4(b) and 12.4(c)
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),	

3. Metrology Procedure: Part B

Section	Description	Participant Comments				
2.3	Jurisdictional Update	<p>Recommend update for clarity:</p> <table border="1"> <thead> <tr> <th>Jurisdiction</th> <th>Variation in accordance with jurisdictional policy</th> </tr> </thead> <tbody> <tr> <td>Victoria</td> <td><i>Where metering data for a type 5 metering installation is collected via remote acquisition, Estimations need not</i></td> </tr> </tbody> </table>	Jurisdiction	Variation in accordance with jurisdictional policy	Victoria	<i>Where metering data for a type 5 metering installation is collected via remote acquisition, Estimations need not</i>
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Section	Description	Participant Comments		
		<table border="1" data-bbox="1014 272 1910 368"> <tr> <td data-bbox="1014 272 1205 368"></td> <td data-bbox="1205 272 1910 368"><i>be provided routinely or as a result of a change to the current published Scheduled Reading Date</i></td> </tr> </table> <p data-bbox="1014 368 1910 480"><i>Also the note should be deleted as the dates are historical and therefore not required anymore</i></p>		<i>be provided routinely or as a result of a change to the current published Scheduled Reading Date</i>
	<i>be provided routinely or as a result of a change to the current published Scheduled Reading Date</i>			
2.4	Change to 'F' Metering Data Quality Flag	<p data-bbox="1014 496 1910 528">Note the following:</p> <ul data-bbox="1059 568 1888 871" style="list-style-type: none"> <li data-bbox="1059 568 1888 719">• Description of “F” Quality Flag: “For Substitutions that are of a permanent or final nature and, subject to section 2.5(b) & (e), the final Substituted metering data would not be replaced by Actual Metering Data at any time.” <li data-bbox="1059 759 1888 871">• “‘F’ metering data can only be replaced with ‘F’ metering data as per section 2.5.1(f) or ‘A’ metering data as per section 2.5.1(b) or 2.5.1(h).” <p data-bbox="1014 911 1910 943">My query/potential changes:</p> <ul data-bbox="1059 983 1731 1015" style="list-style-type: none"> <li data-bbox="1059 983 1731 1015">• Remove “1” as there is not a 3rd level in Section 2.5. <p data-bbox="1014 1054 1910 1086">Should the “(e)” be changed to “(h)” in the Description of F Quality Flag?</p>		
2.6	Page number links replaced with section links	<p data-bbox="1014 1126 1910 1158">Agree to the insertion of Type 21 and Type 59 to the Summary table.</p> <p data-bbox="1014 1198 1910 1230">However section 3.2(f) should be updated to reflect the following:</p> <p data-bbox="1014 1270 1910 1302">The MDP may only undertake Sunstitution types 14,15,16,17,18,19,20 or</p>		

Section	Description	Participant Comments
		21 where Substitution types 11,12, and 13 are not applicable or cannot be carried out.
3.2	Substitution Rules	Does any other specific clarification need to be provided as to when new Substitution Type 21 (from table in Section 2.6) must be applied or when Substitution Type 21 is not applicable?
3.3.8	Change to Type 18 – Alternative wording	
3.3.11	Addition of Type 21 - Five-minute Conversion No Historical Data	Suggest the following narrative as the statement as proposed is conflicting; the metering installation is not one where data is available for 5m interval: <i>Where no Historical Data exists for a metering installation, following the conversion.....</i>
4.2	Substitution and Estimation Rules	Does any other specific clarification need to be provided as to when new Substitution Type 59 (from table in Section 2.6) must or must not be applied? For example in 4.2(d)(i) and/ or 4.2(d)(ii)
4.3.3	Changes to Type 53 - Revision of Substituted Metering Data	Suggest the following narrative as the narrative is ambiguous: To perform a type 53 Substitution, MDP must re-substitute or change the original substituted metering data, prior to collecting.....
4.3.9	Addition of Type 59 – Five-minute Conversion No Historical Data	Refer to 3.3.11
11.2.1	Update to section reference to Metrology	Agree

Section	Description	Participant Comments
	Procedure: Part A	
11.2.2	Update to section reference to Metrology Procedure: Part A	Agree
11.2.3	Update to section reference to Metrology Procedure: Part A	Agree
11.3.1	Update to section reference to Metrology Procedure: Part A 'Half hourly' reference updated to 'Interval'	Agree
11.3.2	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Agree
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	Agree
11.5	Update to section reference to Metrology Procedure: Part A	Agree

Section	Description	Participant Comments
	Change end dates from '23:30' to '23:55'	
11.6	Change end dates from '23:30' to '23:55'	Agree
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	Agree
13.1.4	Update to section references	
13.2.2	Update to section reference to Metrology Procedure: Part A	
13.2.4	Update to section references Update to formulas	
13.2.5	Update to formulas	
13.2.6	Update to section references Update to formulas	Agree
13.3	Update to section references	Agree
13.3.2	Update to section reference to Metrology Procedure: Part A	Agree

Section	Description	Participant Comments
13.4	Update to section reference	Agree
13.5.2	Update to section reference to Metrology Procedure: Part A	Agree
13.5.4	Update to section reference Update to formulas	Agree
13.5.5	Update to formulas	
14.1	Update to section reference	Agree
14.3	Update to section reference	Agree

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

Section	Description	Participant Comments
3.3.3	Included references to five-minute interval metering data	Agree
4.3	NMI data details record (200) - Added '5' to the Interval Length field Definition	Will the N1 and N2 <i>MDMDataStreamIdentifier</i> field values still be mandatory in the NEM12 200 record once the MDMF file format is no longer in use?

		Similar questions were raised by CitiPower, Powercor and United Energy in Round 1, but not addressed in the AEMO responses – #19. United Energy “Refer to response to Item 16”. Response to #16 Citipower and Powercor: “Noted”.
Appendix H	Section added to include five-minute meter data file example	Suggestion is to extend reads to 4 decimal places in all examples as per H.1 Especially the data displayed in H.9 300 as is is relevant to a 5 minute intervals

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
2.6.3	Update to TI	Agree
4.4.4	Removal of NEM12 & NEM13 File Clarifications	Agree
5	Updates to various Glossary items	Agree

6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	Agree
1.2.1	Various updates	Agree
1.2.2	Interpretation section removed from the document	Agree
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	Agree to the inclusion May I request that AEMO insert the hyperlinks to the related documents before publication please?
2.3	Update to section (d)	There has been an omission in the update of clause 2.3(d)(i) <i>Within the timeframes specified in clauses 2.3(b) and 2.3(c), provide metering data for those retail customers for which all verification has <u>not</u> been supplied.</i>
3.4	Removal of 'single'	Agree
4.1	Change to character length	Agree

7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	
Meter Data Delivery to AEMO	
NMI transitions from 15/30 minute to 5 minute intervals. (There does not appear to be explicit procedural specifications addressing these matters – necessary in order to specify system requirements)	Clarification if multi metered NMIs must have aligned interval length for all meters/data streams
	<p>In what situations interval reads can be replaced with different interval length reads?</p> <ul style="list-style-type: none"> • i.e: will it be clear as to when an installation becomes a “five minute meter installation” and therefore neither: <ul style="list-style-type: none"> ○ 15/30 minute data (of any quality) will be provided on or after such a date, and ○ 5 minute data (of any quality) will be provide before such a date?
	The same interval length must be provided for all reads for all data streams for a given NMI for any given consumption date.