FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Momentum Energy

Submission Date: 21st 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. Metrology Procedure: Part A

Section	Description	Participant Comments
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter.	Suggests including 5- minute intervals to the following statement: Where a metering installation records interval energy data the interval periods are based on TIs ,parts of a TI 5 minute intervals, 15 minute intervals or 30 minute intervals
7	Removal of South Australia requirement (2) Removal of Tasmania requirement (2)	Supports the proposal to remove the current statement identified as (2) under the South Australian jurisdiction and item (3) should be identified as the new clause (2) for completeness Supports the proposal to remove the current statement identified as (2) under the Tasmanian jurisdiction

Section	Description	Participant Comments
12.2 (f)	Change to clause reference	Agree to the correction to clause reference 12.2(f)
12.8.2 (b)	Change in section reference	Agree to tidying up the section reference

3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to page references	Agree to the update to page references
11.2.1	Update to section reference to Metrology Procedure: Part A	Agree to the update to section reference to Metrology Procedure: Part A
11.2.2	Update to section reference to Metrology Procedure: Part A	Refer to 11.2.1
11.2.3	Update to section reference to Metrology Procedure: Part A	Refer to 11.2.1
11.3.1(a)	Update to section reference to Metrology	Valid Clause should be referenced as Section 11.3.1(a)

Section	Description	Participant Comments
	Procedure: Part A ~~'Half hourly' reference updated to 'Interval'~~	Refer to next row within the table
11.3.1(b)(i)	**Deletion of the narrative 'Half hourly and addition of the word 'interval'**	Suggests the updates to Section 11.3.1 (a) and 11.3.1(b) are detailed separately to remove ambiguity
11.3.2	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Agree to the proposed updates to the following sections: • 11.3.2 (a) [from Section 5.9.2 to Section 12.8.2] • 11.3.2(b) [from Section 5.9.4 to Section 12.8.2] • 11.3.1(c)(ii)(B) [from TI commencing 23:30 to TI commencing 23:55] • 11.3.1©(iii)(B) [from TI commencing 23:30 to TI commencing 23:55]
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 to section reference update for Section 11.4(a). Recommend a typographical error fix for indicator Y: *Y= Five-minute metering data representation for metering installations with 30-minute metering data except interval metering data in respect to loads at child connection points in an embedded network*

Section	Description	Participant Comments
11.5	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Agree to the proposed updates to the following sections: • 11.5(a) [from Section 5.9.2 to Section 12.8.2] • 11.5(b)(i) [from TI commencing 23:30 to TI commencing 23:55] • 11.5(b)(ii) [from TI commencing 23:30 to TI commencing 23:55]
11.6	Change end dates from '23:30' to '23:55'	Agree to the proposed updates to the following sections: • 11.6(a)(ii) [from TI commencing 23:30 to TI commencing 23:55] • 11.6(b)(ii) [from TI commencing 23:30 to TI commencing 23:55]
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	Refer to the proposed changes detailed above in Section 3.9 - Metrology Procedure: Part A Suggestion: Section 12.1(a) of Metrology Procedure: Part B should be revised to state the following: *For each sample metering installation 15-minute period described in*

Section	Description	Participant Comments
		clause 3.9(b) of Metrology Procedure: Part A, divide the 15-minute energy value by three to produce a 5-minute energy value. *Otherwise it will create a conflict with section12.2(a)*
13.1.4	Update to section references	Agree to the update for sections: • 13.1.4(a)(i) • 13.1.4(a)(ii)
13.2.2	Update to section reference to Metrology Procedure: Part A	Agree to the update to section 13.2.2(d) Each MC must update the Inventory Table for the NMIs for which it is responsible on at least a monthly basis to ensure that the accuracy requiremetns in section 12.5 of Metrology Procedure Part A are met
13.2.4	Update to section references	Agree to the update to section 13.2.4(a)
	Update to formulas	No comments to the proposed update to Section 13.2.4©
13.2.5	Update to formulas	No comments to the proposed update to Section 13.2.5(b)
13.2.6	Update to section references	Agree to the update to section 13.2.6(a) & 13.2.6(b)
	Update to formulas	No comments to the proposed update to formulas in section 13.2.6©
13.3	Update to section references	Agree to the proposed update to section reference for Uncontrolled Unmetered Devices

Section	Description	Participant Comments
13.3.2	Update to section reference to Metrology Procedure: Part A	Agree to the proposed update to section 13.3.2(d)
13.4	Update to section reference	Agree to the proposed update to section reference for 13.4(b)
13.5	**Update to section reference for Traffic signal dimming**	Agree to the proposed update to section 13.5
13.5.2	Update to section reference to Metrology Procedure: Part A	Agree to the proposed update to section 13.5.2(d)
13.5.4	Update to section reference	Agree to the proposed update to section 13.5.4(b)
	Update to formulas	No comments to the proposed change to formula in section 13.5.4©
13.5.5	Update to formulas	No comments to the proposed change to formula in section 13.5.5(b)
14.1	Update to section reference	Agree to the proposed update to section 14.1
14.3	Update to section reference	Agree to the proposed update to section 14.3(h)(ii)

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 to the statement inserted and identified as Section 3.3.3(b)

| 4.3 | NMI data details record (200) - Added '5' to the Interval Length field Definition | Agree to the insertion of the value 5 in the definition column for the field value labelled 'IntervalLength' |
| Appendix H | Section added to include five-minute meter data file example | Agree to the addition of the 5-Minute Interval Metering Data - Metering Installations with remote acquisition |

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
2.6.3	MDM Procedures – insertion of narrative 'Trading Interval'	Was not identified as one of the updates to the REM Glossary & Framework Agree to proposed update to wards the improvement of processes to include the conversion of Meter Readings to Trading Interval data for settlement purposes
4.4.4	Removal of NEM12 & NEM13 File Clarifications	Agree to the deletion of Section 4.4.4(b) to remove duplication of the same information in 2 separate documents. Suggest the following updates for completeness: • 4.4.4© to be identified as the new 4.4.4(b) • 4.4.4(d) to be identified as the new 4.4.4©
5*	Addition of various glossary items, including	Agree to the consolidation of the various glossary items into a central

	those from the 'Meter Data Provision Procedure'	document for ease of reference

6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	
1.2	Addition of information about the inter-relationship between the Retail Electricity Market Procedures and the Metering Data Provision Procedures	Added as not initially identified in the consultation
1.2.1*	Glossary removed and now included in the Retail Electricity Market Procedures – Glossary and Framework document	Refer comments in Section 5 for the Retail Electricity Market Glossary and Framework
1.2.2	Interpretation section removed from the document	Refer comments in Section 5 for the Retail Electricity Market Glossary and Framework
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	Agree

7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	Profiling meter data to 5-minute trading interval (TI) is an interim and partial solution that introduces operational risks for every registered or accredited participant.The industry is expected to adopt the proposed solution to manage numerous 'business critical' processes until such time all existing meters across the NEM are either replaced or re-configured to provide 5 minute data. I July 2021 to 1 December 2022, is a lengthy transitional period for relying on an interim solution where AEMO is responsible for profiling meter data to 5 m TI for the large volume of meter types 4, 5 and 6 across the NEM. The 5m program risks and issues log does not provide visibility of the risks & issues identified as part of the AEMO's internal project and in fairness, we should be updated. Stakeholders such as generators,aggregators, LNSPs, MCs, MPs, MDPs and a wide cross-section of retailers should have been engaged at an earlier timeframe to effectively discuss and come up with options for 5 ms. Momentum's view and preference is for AEMO to provide two sets of meter data feeds to the retailers; one which has been profiled and the other feed the original data set as uploaded by the Meter Data Providers or Local Network Service Providers to AEMO.
• What is your view on the proposed profiling approach for 15 and 30-minute non-controlled load meter reads and why?	

Heading	Participant Comments
• What is your view on the proposed profiling approach for 30-minute controlled load meter reads and why?	
• 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?	
Meter Data Delivery to AEMO	
• What are your views on AEMO transitioning to MDFF and why?	
• What are your views on AEMO supporting the reception of register level meter data and why?	
• What are your views on MDPs sending the same files to both market participants and AEMO, energy and non-energy, and why?	

Heading	Participant Comments
• What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	