

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 1)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo Energy

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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
3.8	Metering Installation Clock- this section was not included for update by AEMO as part of the 5 MS changes.	<p>Red Energy and Lumo Energy (Red and Lumo) question why AEMO did not propose updates to clause 3.8(a) of this Procedure.</p> <p>Clause 3.8(a) (highlighted below) allows for a type 4A or type 5 metering installation clock to be out by a maximum of +300 seconds. However, 300 seconds is equivalent to 5 minutes, therefore permitting the loss of data for that full interval.</p> <p>We request that AEMO review this clause in light of the updates required for 5 minute settlement of metering data.</p> <p>Metering Installation Clock A type 4A, 5 or 6 <i>metering installation</i> clock is to be reset to within ± 20 seconds of <i>Eastern Standard Time</i> on each occasion that the <i>metering installation</i> is accessed in the circumstances referred to in paragraphs (a) and (b), and the maximum drift in the type 4A or 5 metering installation clock permitted between successive Meter Readings is ± 300 seconds.</p>
3.9	The end of each TI must be on the hour (EST) and each continuous period of 5 minutes thereafter.	Red and Lumo support the proposed inclusions to clause 3.9 however note that TI is a defined term in the Glossary and Framework as <i>trading interval</i> (as defined in the NER).

		We recommend the use of the term <i>trading interval</i> instead of TI throughout the Procedures to highlight that it is defined in the NER - consistent with the other terms e.g. <i>metering installation</i> and <i>interval energy data</i> .
4.1	Minimum Services Specification	Under rule 7.8.3(b), AEMO must outline a Procedure for minimum services specification which it includes in this Procedure (Metrology Part A). AEMO have only covered half of its obligation in rule 7.8.3(b) as this Procedure outlines the minimum service levels - service availability and completion timeframes - however, it does not have a section regarding both of the minimum standards as required in rule 7.8.3(b)(2), namely accuracy requirements. <u>We recommend that AEMO include the accuracy requirements for the minimum services specification as obligated to in rule 7.8.3(b)(2).</u>
7	Removal of South Australia requirement (2) Removal of Tasmania requirement (2)	Red and Lumo provide qualified support, on the basis that the relevant distributors support the removal of these requirements.
12.2(f)	Change to clause reference	Red and Lumo support proposed amendment to correct reference clause.
12.8.2(b)	Change in section reference	Red and Lumo support proposed amendment to correct reference clause.

3. Metrology Procedure: Part B

Section	Description	Participant Comments
All	Trading Interval	As per the comment above in relation to the Metrology Procedures: Part A, we recommend the use of the term <i>trading interval</i> instead of TI throughout the Procedures to highlight that it is defined in the NER - consistent with the other terms e.g. <i>metering installation</i> and <i>interval metering data</i> .
2.6	Update to page references	Red and Lumo support the amendment as proposed.

11.2.1	Update to section reference to Metrology Procedure: Part A	Red and Lumo support the amendment as proposed.
11.2.2	Update to section reference to Metrology Procedure: Part A	Red and Lumo support the amendment as proposed.
11.2.3	Update to section reference to Metrology Procedure: Part A	Red and Lumo support the amendment as proposed.
11.3.1	Update to section reference to Metrology Procedure: Part A 'Half hourly' reference updated to 'Interval'	Red and Lumo support the amendment as proposed.
11.3.2	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Red and Lumo support the amendment as proposed.
11.3.3	Sample Meters	Red and Lumo query whether AEMO is comfortable with this clause only applying in South Australia. We also recommend the following amendment to clause 11.3.3(b)(v): (v) The LNSP must ensure that a meter which is a sample Interval Meter installed for the purposes of calculating the CLP is not removed without the <u>prior</u> consent of AEMO. Further, we question whether there should be an obligation on the LNSP to publish a list of sample meters to ensure that they are not inadvertently removed by the metering coordinator when they are undertaking a meter exchange on behalf of a retailer (both within SA and outside SA).
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'	Red and Lumo support the proposed amendments to formulas and calculations at this stage. However, we note that further investigation is required on the impacts this may have to embedded generation, in particular where small customer generation is recorded at 30 minute intervals.

	Updates made to formulas	<p>We consider that we are unlikely to be the only retailer with concerns regarding how this calculation will work for energy inflows when it is fed into a TNI prior to establishing a NSLP.</p> <p>We request that AEMO considers the impact of this and confirms the outcome of its considerations in terms of amendments required to the methodology for formula amendments.</p>
11.5	Update to section reference to Metrology Procedure: Part A Change end dates from '23:30' to '23:55'	Red and Lumo support the amendment as proposed.
11.6	Change end dates from '23:30' to '23:55'	Red and Lumo support the amendment as proposed.
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	Red and Lumo support the proposed amendment, however, as detailed in comments to section 11.4, we wish to clarify that AEMO has considered impacts to embedded generation (30 minute interval data) as part of this and any potential implications this may have.
13.1.4	Update to section references	Red and Lumo support the amendment as proposed.
13.2.2	Update to section reference to Metrology Procedure: Part A	Red and Lumo support the amendment as proposed.
13.2.4	Update to section references Update to formulas	Red and Lumo support the amendment as proposed.
13.2.5	Update to formulas	Red and Lumo support the amendment as proposed.
13.2.6	Update to section references Update to formulas	Red and Lumo support the amendment as proposed.
13.3	Update to section references	Red and Lumo support the amendment as proposed.

13.3.2	Update to section reference to Metrology Procedure: Part A	Red and Lumo support the amendment as proposed.
13.4	Update to section reference	Red and Lumo support the amendment as proposed.
13.5.2	Update to section reference to Metrology Procedure: Part A	Red and Lumo support the amendment as proposed.
13.5.4	Update to section reference Update to formulas	Red and Lumo support the amendment as proposed.
13.5.5	Update to formulas	Red and Lumo support the amendment as proposed.
14.1	Update to section reference	Red and Lumo support the amendment as proposed.
14.3	Update to section reference	Red and Lumo support the amendment as proposed.

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

Section	Description	Participant Comments
3.3.3	Included references to five-minute interval metering data	Red and Lumo support the amendment as proposed.
4.3	NMI data details record (200) - Added '5' to the Interval Length field Definition	Red and Lumo support the amendment as proposed.
Appendix H	Section added to include five-minute meter data file example	Red and Lumo support the amendment as proposed.

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
4.4.4	Removal of NEM12 & NEM13 File Clarifications	Red and Lumo support the amendment as proposed.
5	Addition of various glossary items, including those from the 'Meter Data Provision Procedure'	Red and Lumo support the amendment as proposed.

6. Meter Data Provision Procedure

Section	Description	Participant Comments
1.1	Changes to NER clause references and minor administrative updates	Red and Lumo seek clarification why AEMO considered the removal of defined term Distribution Network Service Provider and replaced this with the abbreviation (DNSP)? Noting the changes requested to trading interval above, we support the other amendments as proposed.
1.2.1	Glossary removed and now included in the Retail Electricity Market Procedures – Glossary and Framework document	Red and Lumo support the amendment as proposed.
1.2.2	Interpretation section removed from the document	Red and Lumo support the amendment as proposed.
1.3	Retail Electricity Market Procedures – Glossary and Framework added as a related document	Red and Lumo support the amendment as proposed.

7. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Profiling 15 and 30-minute meter reads to 5-minute trading intervals	
<p>What is your view on the proposed profiling approach for 15 and 30-minute non-controlled load meter reads and why?</p>	<p>Red and Lumo Energy note the efforts undertaken by AEMO in determining a proposed profiling solution for 5 minute settlement.</p> <p>In theory, what has been proposed seems to be the most viable solution. However, we believe that AEMO alongside industry participants require further analysis and consideration into whether in practice it is fit for purpose.</p> <p>We also question what would be the process AEMO would undertake, should the profiling approach be found to require amendment?</p>
<p>What is your view on the proposed profiling approach for 30-minute controlled load meter reads and why?</p>	<p>As above, we consider that what has been proposed seems viable in theory, and welcome AEMO working with industry to undertake further analysis and ensure that it is fit for purpose in practice.</p>
<p>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>	<p>At this stage, we do not have other options to propose. However, it is imperative that AEMO undertake a complete investigation and analysis into any proposed solution to ensure there is no detrimental impacts to market participants.</p>
Meter Data Delivery to AEMO	
<p>What are your views on AEMO transitioning to MDFF and why?</p>	<p>Red and Lumo support the transition to MDFF, the only foreseeable issue we have is how AEMO will manage this? What validation processes and issues has AEMO considered? Such as, the rejection processes (who is notified?) and notification processes (if AEMO rejects a file is the FRMP notified?).</p>

<p>What are your views on AEMO supporting the reception of register level meter data and why?</p>	<p>Red and Lumo do not support the reception of register level meter data and firmly believe that this must not be considered for change.</p> <p>Aside from the fact that this will be very expensive to implement, we consider that this will be messy and cause more confusion. This is outside the scope of 5 minute settlement, and no further changes should be considered.</p>
<p>What are your views on MDPs sending the same files to both market participants and AEMO, energy and non-energy, and why?</p>	<p>MDPs have obligations to send energy information to retailers, distributors and AEMO. Information that is beyond that scope must be contractually arranged.</p> <p>As above, this is beyond the scope of 5 minute settlements, and should not be considered at this time. While we understand that AEMO has their systems open, this should be discussed and agreed with industry about the extra scope / functionality AEMO wishes to build, and where requested, a cost-benefit be undertaken. Industry are subject to considerable pressures regarding costs, as such, it is difficult to support additional costs for functionality that may never be required.</p> <p>Additionally, have the following questions to AEMO regarding the enhancements:</p> <ul style="list-style-type: none"> ● What information pertaining to energy or non-energy is being proposed? And for what purpose would AEMO or other market participants require non-energy information? ● What additional functions does AEMO see itself performing with the data (energy and non-energy) it receives? Will these functions be completed on a user-pays basis or will the costs of conducting these functions be paid for by all customers? How will AEMO use the additional data if not to perform additional functions? ● What additional data does AEMO consider useful to acquire? Why can't AEMO enter into contractual arrangements to access that data? ● How would additional data be stored? what confidentiality requirements would be placed on it? who would have access? Will AEMO's legislated indemnity apply to data that isn't covered under the Rules or Procedures?
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>There are no challenges to overcome in adopting the proposed changes, as the changes are not part of the scope of 5 minute settlements.</p>

	<p>We firmly object to all changes that are beyond the scope of the 5 minute settlement rule.</p> <p>AEMO must justify any costs associated with an expanded scope of its system build or functionality that goes beyond the scope of the changes that 5 minute settlement have been mandated to apply.</p> <p>AEMO will bear additional costs, which ultimately will be passed onto consumers, resulting from this extra unrequired functionality and enhancements that AEMO states explicitly in its consultation paper that is “not required by the 5MS rule” and would only be used “if provided by MDPs”.</p>
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