

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AGL

Submission Date: 24 June 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 Metering ICF Package Changes consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. MSATS Procedures: CATS

CATS Section	Description	Participant Comments
General AGL		<p>AGL notes the various changes of field/Data types that have been made to parts of the CATS Procedures, eg Datastream Type. However, these changes have not been made consistently through the document and various tables etc. – eg Datastream type which appears as ‘Datastream <u>t</u>ype’ and ‘Datastream <u>T</u>ype’.</p> <p>AGL suggests that as these changes have been started, they should be completed through the documents.</p>
General AGL		AGL notes that there are multiple instances (eg CI 7.7 through to 42.3.4 iv) where table references have not been updated from A,B,C etc. to 1,2,3 etc.
2.1(h) AGL	Obligation to define timeframes for updating datastreams in MSATS from 20 to 10 b/days – see 2.4(c)	AGL Agrees with the proposed change
2.1.(l)	New section added to clarify the communication of the identification of incorrect NMI	AGL Agrees with the proposed change
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	AGL Agrees with the proposed change in relation to the effective day. However, the two-day timeframe to update an interval datastream may be too short – see comments below.

CATS Section	Description	Participant Comments
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	<p>AGL Agrees with the proposed change, but notes that the ICF was raised in relation to incorrect NMIs, while this obligation has been drafted to cover all standing data which may lead to unexpected consequences.</p>
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	<p>Many changes in NMI status are affected by a 'main-switch disconnect' which is often reversed by the consumer. The purpose in maintaining the interval datastream is to ensure that energy usage is detected and can be acted on.</p> <p>AGL suggests that the two business day timeframe is too short.</p> <p>AGL also notes that the timeframes for an LNSP to update a NMI status (2.3(e) and 2.4(i)) have not changed from the current five business days and are extensively covered in the CATS procedures.</p> <p>At the very least, AGL believes that these timeframes are sequential; that is five for the LNSP, seven (plus 2) for the MDP.</p> <p>AGL also considers that the timings could be different from customer requested disconnection to abolishment.</p>
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	<p>AGL notes that the obligation as drafted is inadequate. The MDP can only create datastreams once it has been advised by the MP that the meter has been installed or reconfigured.</p> <p>Noting the proposed extension to 30 days for enabling communications to be made operational, there may be delays for meters with communication issues, which this obligation would have to account for.</p> <p>Finally, to enable datastreams to be delivered quickly, there would need to be changes made to the MP SLAs as they have 5 b/days to update MSATS, and this process follows MP activities.</p>

CATS Section	Description	Participant Comments
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	AGL Agrees with the proposed change
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	<p>AGL notes the proposed update for remote services but suggests that as an MPB may also be able to energise and de-energise a meter locally (eg 4A meters), that the proposed wording should have 'remotely' removed. i.e.:</p> <p>...that is remotely de-energised, the Proposed Change Date...</p>
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	<p>AGL notes the proposed update for remote services but suggests that as an MPB may also be able to energise and de-energise a meter locally (eg 4A meters), that the proposed wording should have 'remotely' removed. i.e.:</p> <p>...that is remotely Re-energised, the Proposed Change Date...</p>

CATS Section	Description	Participant Comments									
4.10 Table 4-10		<p>AGL notes that this section refers to Meter Register, but the description refers to the meter. In an environment where the state of the meter and the state of the register can be managed by different parties, AGL believes that this section should be clearer.</p> <p>AGL suggests that the titles of cl 4.11.3 be updated to ‘Meter Register Status Codes’.</p> <p>AGL also notes that a disconnected register does not mean that a meter is disconnected, on that register is disconnected. For a meter to be disconnected all registers would have to be disconnected.</p> <p>AGL suggest that the of Meter Register Status ‘D’ be updated to remove the word ‘remotely’ reflect that it is disconnect by the MP (either locally or remotely).</p> <p>NOTE – Under the NER the meter is the device, whereas this clause it is not clear if this covers the device or the meter registers.</p> <table border="1" data-bbox="994 916 1946 1147"> <tbody> <tr> <td data-bbox="994 916 1077 999"></td> <td data-bbox="1081 916 1341 999">Current</td> <td data-bbox="1346 916 1946 999">Applies when a <i>meter</i> at the <i>NMI</i> is current and not disconnected.</td> </tr> <tr> <td data-bbox="994 1002 1077 1054"></td> <td data-bbox="1081 1002 1341 1054">Removed</td> <td data-bbox="1346 1002 1946 1054">Applies when a <i>meter</i> at the <i>NMI</i> is removed.</td> </tr> <tr> <td data-bbox="994 1058 1077 1147">D</td> <td data-bbox="1081 1058 1341 1147">Remotely Disconnected</td> <td data-bbox="1346 1058 1946 1147">Applies when a <i>meter</i> <u>register</u> at the <i>NMI</i> is Disconnected</td> </tr> </tbody> </table>		Current	Applies when a <i>meter</i> at the <i>NMI</i> is current and not disconnected.		Removed	Applies when a <i>meter</i> at the <i>NMI</i> is removed.	D	Remotely Disconnected	Applies when a <i>meter</i> <u>register</u> at the <i>NMI</i> is Disconnected
	Current	Applies when a <i>meter</i> at the <i>NMI</i> is current and not disconnected.									
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D	Remotely Disconnected	Applies when a <i>meter</i> <u>register</u> at the <i>NMI</i> is Disconnected									

CATS Section	Description	Participant Comments
4.18(f)	Updated to clarify the LNSP's obligations in relation to creating Embedded Network Codes and ENM's obligations in relation to application of the Embedded Network Code and data provided to AEMO upon appointment.	<p>Noted</p> <p>AGL supports the obligations to ensure that child NMIs are created and established quickly.</p> <p>However, AGL queries why there is a requirement to generate and provide an Embedded Network Code triggered by the ENM appointment. Many sites will have ENMs appointed as a regulatory obligation, but these sites may not require Embedded Network Codes or Child NMIs at the time of ENM appointment. It seems inefficient to require EN Codes when they are not needed.</p>
15.1 AGL		Correction Noted
16.2(e) AGL		<p>AGL notes that the Conditions Precedent for a meter exchange is for the new meter to have a different serial number from the old meter.</p> <p>In the Post PoC environment, AGL does not believe that this requirement can be made mandatory, as there are now multiple meter providers any of which may have duplicate serial numbers, and no obligation to have differing meter serial numbers from other providers.</p> <p>AGL suggests that this clause be deleted or modified to make the requirement preferred, but not mandatory.</p>
17.4(e) AGL		<p>AGL notes that the end of clause (e) has a different font color.</p> <p>Is there a reason for this ?</p>

CATS Section	Description	Participant Comments
19.2(e) AGL		<p>AGL notes that the Conditions Precedent for a meter exchange is for the new meter to have a different serial number from the old meter.</p> <p>IN the Post PoC environment, AGL does not believe that this requirement can be made mandatory, as there are now multiple meter providers any of which may have duplicate serial numbers, and no obligation to have differing meter serial numbers.</p> <p>AGL suggests that this clause be deleted or modified to make the requirement p[referred, but not mandatory.</p>

3. MSATS Procedures: WIGS

MSATS Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	Noted
General AGL		Note – there seem to be a number of table references within the MSATS: WIGS Procedures which have not been updated – examples below
2.7 AGL		Note – change of table ID required from 2-A to 2-1 in this clause.
2.8 AGL		Note – change of table ID required from 2-A to 2-1 in this clause.
7.6 AGL		Note – change of table ID required from 7-A to 7-1 in this clause.

4. Metrology Procedure: Part A

Met A Section	Description	Participant Comments
3.1.(a)	Update to remove the word 'relevant'	Noted – unclear if this change has value
3.1.(b)	Update to remove the word 'relevant'; add requirements of AS60044.3 or IEC61869.1 and IEC61869.2; and detail what each topic the part of the standard covers	Noted
3.1.(c)	Update to remove the word 'relevant'; add requirements of IEC61869.1 and IEC61869.3; and detail what each topic the part of the standard covers	Noted
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	Noted Noting clause 3.1(e) AGL suggests that for clarity this clause be amended to clarify that it applies to 'New New <u>Newly purchased</u> CTs...' as opposed to Newly used (eg old unused stock)
3.6(a) AGL		AGL queries if there should continue to be any differentiation between 1 st and 2 nd tier obligations, such as component approvals, or should these now have an end date.
12.5.(a)	Removal of obsolete standard AS2490	AGL notes the removal of AS2490 from the procedure and queries what impact it may have on existing sample plans currently being deployed which use AS 2490. Do current testing programs need to be grandfathered ?

Met A Section	Description	Participant Comments
12.5.(b)	New section added to detail Sample Test Plan settings	Noted – see comment for 12.5(a)
12.5.(c)	New section added to specify when a test sample is deemed to have passes the verification test	Noted – see comment for 12.5(a)
12.5.(d)	New section added to specify when the steps to be followed after each round of verification	Noted – see comment for 12.5(a)
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	Noted

5. Metrology Procedure: Part B

Met B Section	Description	Participant Comments
2.3 (a) AGL		This clause continues with “By n” Is there an incomplete statement or is this a typo ?
2.3 AGL		There is a note associated with this Jurisdictional Provision that indicates it is to be reviewed by 31 Dec 2017. Has this review been completed and is this provision still current ?
2.4 AGL		Should the list of Meter Data Quality Flags be extended to recognise Customer Own Reads (CoR) separately given the more extensive use of CoRs and the likely impact of proposed Rules. AGL notes that CoRS are presently considered Type 67 Substitutions, which makes their hierarchy greater than Estimate.
2.6	Update to include additional substitution type 69	AGL supports the inclusion of the Linear Interpolation methodology.
5.3.9	Addition of substitution type 69: Linear Interpolation	AGL supports the inclusion of the Linear Interpolation methodology.

6. Service Level Procedure Meter Data Provider Services

MDP SL Section	Description	Participant Comments
2.4.1.(ix)	New section added to define an obligation to activate datastreams when energy is recorded from a metering installation while the NMI status is not Active	
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	
2.4.1 (xi) AGL (D)		<p>AGL notes the requirement to de-activate data streams when a NMI has the service fuse removed, however, the MSATS standing data doesn't differentiate between service fuse removal and main switch seal. Rather either physical outcome will lead to the LNSP marking the NMI Status as "D".</p> <p>While this criteria may function when the LNSP and MDP are the same party, there may be greater difficulties for third party MDPs to meet this obligation.</p>
3.12.6 AGL		<p>AGL notes the clause requires immediate notification, however, general practice is more likely 2 hours to allow the participant to resolve the issue. Noting that most data transfers occur around midnight, it's unlikely that any party (except the MDP) will be available.</p> <p>Should this clause be amended ?</p>

4.2.(g)	Amend outdated rule reference	Noted
6.4.1.(c)	Amend outdated rule reference	Noted
7.3.(b)	Amend outdated rule reference	Noted

7. Service Level Procedure Meter Provider Services

MP SL Section	Description	Participant Comments
4.2.(a)(iii)	Amend outdated rule reference	Noted
5.2.(a)	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted

8. Service Level Procedure Embedded Network Manager

SNM SL Section	Description	Participant Comments
General AGL		The procedure has specifically identified a situation when an ENO has no exemption but hasn't covered off the situation where the ENO loses its exemption or the ENM loses its accreditation.
2.1.2.(d)	New section added to define an obligation that the EN for which the ENM has been appointed has an exemption by the AER.	AGL supports the additional obligation but believes that the procedures should define what the ENM must do if the network owner does not have, or is not seeking, an exemption from the AER.
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	Noted
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	<p>Noted</p> <p>However, there seems to be no SLA on AEMO to publish or update the site specific DLF, or how to deal with a site specific DLF if it is generated post 1 April in any year.</p> <p>There should be a clear obligation to provide it to AEMO and for AEMO to update, or add, the Site Specific DLFs into MSATS within 5 b/days of receiving it and update any associated publications.</p>

SNM SL Section	Description	Participant Comments
4.3.2 AGL		<p>AGL notes that CI 4.3.1(b) specifically exempts an ENM from the requirement to maintain MSATS standing Data while a Child NMI has a status code of 'N'. However, 4.3.2 does not require the ENM to update the NMI Standing Data when the NMI resumes its role as a child connection Point.</p> <p>AGL suggests an additional obligation be included that requires the ENM to ensure that <u>all</u> standing data has been updated prior to the NMI status code changed to 'A'.</p>
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	Noted

9. Exemption Procedure Meter Installation Malfunctions

Exemp Section	Description	Participant Comments
1.1.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted
Appendix B	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Noted

10. Other Issues Related to Consultation Subject Matter

Other Heading	Participant Comments
<p>Are there better options to accommodate the change proposals, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?</p>	<p>The majority of the proposed changes within this consultation are relatively separate from the 5ms and Global changes. However, ensuring that consequential changes are reviewed correctly is complex.</p>
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>The main challenge with the co-consultation is ensuring the sequence of changes being undertaken don't lead to unintended consequences – eg reviewing the various procedures to ensure that a change is not included and then and then later removed incorrectly, or including a change which is inconsistent with the applicable market.</p>