

24 October 2018

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Sir/Madam,

Draft Rule Determination

National Electricity Amendment (Metering Installation Timeframes) Rule 2018

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) draft rule change.

PLUS ES has reviewed the following areas of the rule change:

Unaccounted for Energy (UFE)

PLUS ES has no concerns regarding this area of the rule change.

Billing for Distribution Services

PLUS ES has no concerns regarding this area of the rule change.

Virtual Transmission Nodes

PLUS ES supports the continued use of VTNs as it is an efficient way of aggregating many small unmetered loads for a single customer across a large geographic area. Any movement away from using VTNs for the purpose of managing unmetered loads would substantially increase the number of connection points and has the potential to make the process unwieldy. PLUS ES would encourage AEMO to provide the necessary exemptions to (at least) support the current VTN structure.

Unmetered Loads

PLUS ES supports the inclusion of non-market unmetered loads into the settlement process. However, PLUS ES suggests the solution should be commensurate with the volume of energy being measured and as such, the continued use of VTNs to facilitate the inclusion of these loads into the settlement process.

Non-Market Generators

PLUS ES has no concerns regarding this area of the rule change.

Transitional Rules

PLUS ES supports the inclusion of all first tier loads into the settlement process - Including non-controlled load accumulated metering data which can currently be excluded from delivery to MSATS. PLUS ES acknowledges some MDPS managing regulated metering services already provide this metering data to AEMO.

Implementation

PLUS ES recommends that the provision of metering data to MSATS for both non-market unmetered loads and non-controlled load accumulation meters is necessary to support the transition to global settlements and could be delivered within the existing metering data file formats (MDFF to market participants and MDM to MSATS).

PLUS ES notes that the implementation being promoted by AEMO, as part of the 5 Minute Settlement consultations, is a significant deviation from the current processes and will add unnecessary costs. Of particular concern is the proposal to move from the MDM file format to MDFF for the delivery of accumulated metering data to MSATS. PLUS ES have raised the following issues with AEMO regarding any proposal to utilise MDFF files for accumulated meter data provision to MSATS:

- To date, we have been unable to determine the quantifiable benefit or justification of change from AEMO against the cost to participants to comply;
- PLUS ES believes that there will be costly system changes to store MDFF data at a line level as per the current MDM format. This transition will effectively require a rebuild of the process that took 6 months to stabilize when the market started and is for a Meter Installation Type on the decline. (Estimated cost of a minimum of \$200,000);
- PLUS ES would expect a reduced error feedback loop against the current specific error codes per line returned to advise of MDM data provision issues;
- There is an expectation that a move to MDFF would result in increased manual error handling. Our current metering system for accumulated meter data delivery (MBS) has significant logic and automated handling to resolve existing MDM errors returned from MSATS. This logic would need considerable effort to analyze, redesign and implement;
- We understand there is a proposal to de-couple from Active Datastreams as a part of the 5 Minute Settlements analysis. Currently, MDM files are only sent with data where Datastreams are active whilst MDFF send all readings in the system to FRMPs



regardless of Datastream Status. Therefore timing issues will exist with MDFF for data without active Datastreams. Given that there is an MDM solution in place, is the change and cost justifiable?

PLUS ES would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Linda Brackenbury on 02 4951 9921 or at Linda.Brackenbury@pluses.com.au.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Clark".

Jason Clark
EGM - PLUS ES