



23 October 2017

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Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
South Sydney NSW 1235

Dear Mr Pierce

RE: AEMC Draft Rule Determination – National Electricity Amendment (Five Minute Settlement) Rule 2017

Ausgrid Business Services (ABS) welcomes the opportunity to make a submission to the AEMC to its draft rule determination on the introduction of five minute settlements.

ABS agrees with the proposal to move to five minute settlement periods. In addition to the benefits to the settlements processes listed in the draft determination, the change aligns with the requirements being expressed by many retailers and other market participants consuming contestable metering services.

However, ABS would like to make comment on the following matters:-

Publication of Procedures by AEMO

ABS contends the proposed timing of the publication of procedures by 1 December 2020 provides insufficient time to facilitate the design, development and testing of system changes prior to participation in the proposed industry testing period. ABS proposes the procedures be published by 1 January 2020 or 12 months prior to the commencement of any proposed industry testing, whichever is later.

Continuation of Parallel Data Delivery

ABS agrees with the proposal to consolidate the file formats used to deliver metering data to both AEMO and market participants. However, ABS strongly encourages the retention of the current obligations on metering data providers to deliver metering data to both AEMO and market participants separately. Over the past 15+ years, the industry has actively promoted the close interaction between metering service providers and those market participants receiving their services.

Metering businesses have developed numerous products and services that are best delivered bilaterally such as alternate file formats and delivery mechanisms.

Single File Format Solution

The high level design document is not clear as to whether or not the new file format will consume the legacy formats or will be used exclusively for five minute data delivery and the legacy formats retained for the provision of other data. ABS contends the new file format should replace all legacy formats and be designed such that it supports five, fifteen and thirty minute data intervals.

Fifteen Minute Settlement Data

A large quantity of existing type 4 metering installations measure metering data in fifteen minute intervals. As the rule change allows for many of these to remain until replacement is necessary, ABS contends the settlement process should also accept fifteen minute data. Currently, metering data providers aggregate fifteen minute data to thirty minute intervals for provision to AEMO. It appears contrary to the rule change objective and not in the interest of accuracy for this process to continue.

If you would like to discuss this submission further, please do not hesitate to contact the the undersigned on (02) 8719 3027 or jvonstieglitz@ausgrid.com.au.

Regards



for

JAMES VON STIEGLITZ
Head of Metering and Data Services