

Dr John Tamblyn
Chairman
Australian Energy Market Commission
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e-mail: submissions@aemc.gov.au

Dear Dr Tamblyn

Re: TransGrid Submission to AEMC on Integration of NEM Metrology Requirements

TransGrid would like to thank the AEMC for the opportunity to comment on this consultation to integrate Tier 1 metering installation requirements into the National Electricity Rules.

Please find attached comments that address six of the twenty six proposed Rule changes.

In summary, the comments focus on recommended changes to the proposal to:

1. reflect existing and mature wholesale market responsibilities for *metering data* storage (Rule Change Proposal No.9);
2. ensure existing data access provisions are uplifted into new clauses to meet Tier 1 customer provisions (Rule Change Proposal No.10);
3. address possible scope omissions for new provisions (Rule Change Proposals 14 and 20); and
4. address possible table drafting errors and inconsistencies (Rule Change Proposals 23 and 24).

The attachment to this letter sets out TransGrid's specific response to each of these matters.

I trust the attached comments are of assistance to you. Should you wish to discuss any of these matters further, please feel free to contact me on (02) 9284-3434 or via email: phil.gall@transgrid.com.au

Yours sincerely

Phil Gall 27/7/07
Philip Gall
Manager/Regulatory Affairs

General

In general, TransGrid supports the proposed Rule changes to integrate first tier metering installations into the provisions of the National Electricity Rules Chapter 7 Metering.

There are, however, a few proposed Rule changes that TransGrid recommends changes for the reasons set out under the following headings.

Rule Change Proposal No.9

The draft new clause 7.6A parts (e) and (f) will introduce a new requirement for responsible persons for Types 1-4 metering installations to ensure that *metering data*, in the form it was collected and any adjustments or substitutions, are stored separately for a period of 7 years.

Responsible persons for Type 1-4 metering installations are not currently required to store *metering data* under the Rules.

With reference to the existing Rule 7.9.2(a) NEMMCO is responsible for the *remote acquisition* of the *metering data* and for the storing of this data as *settlements ready data* in the *metering database*.

In practice, this is achieved for Type 1-4 metering installations through *Metering Data Agents* who currently ensure that *metering data*, in the form it was collected and any adjustments and substitutions, is appropriately stored in accordance with the rules and guidelines issued by NEMMCO. *Metering Data Agents* process the *metering data* to convert it to *settlements ready data* and then forward this data to NEMMCO for settlements purposes.

Metering Data Agents for Type 1-4 metering installations are engaged by the *Financially Responsible Market Participant* and are also deeded as agents for NEMMCO. Consequently there is no commercial or legal relationship between the *responsible person* and the *Metering Data Agent*. Therefore, there is no natural mechanism for the *responsible person* to ensure that the *Metering Data Agent's metering data* storage systems will satisfy the *responsible person's* obligations under the draft new clause. Hence, the *responsible person* will need to either enter into an additional and new commercial arrangement with the *Metering Data Agent* to ensure its liabilities are legally and commercially covered, or alternately, invest in duplicate systems and processes to fulfil its obligations under this proposed Rule change. Either option results in increased costs and no net market benefit, as the *Metering Data Agent* already is obligated to perform the storage of *metering data*.

This rule change proposal in its current form potentially duplicates existing market processes and would therefore result in increased Type 1-4 metering installation (wholesale market) *responsible person* and ultimately consumer costs and therefore does not meet the NEM objective's efficiency and consumer cost benefit requirements.

It is recommended that the scope of the draft new clause 7.6A parts (e) and (f) be limited to Types 5-7 metering installations or be re-drafted to assign the responsibility for data storage to those parties who actually responsible for acquiring the data directly from the metering installations for NEM settlement processes.

Rule Change Proposal No.10

The draft new clause 7.8.2(ca) proposes to allow the *Financially Responsible Market Participant* (FRMP) to provide a 'read only' password to its customer, subject to authorisation by the *responsible person*.

'Read only' passwords for accessing *metering data* held in metering installations must be allocated by the *Metering Provider* (refer NER 7.8.2(c)) and access to this *metering data* is to

be scheduled by the *responsible person* to ensure that congestion doesn't occur (refer NER 7.7(c)).

There needs to be an additional requirement for the *FRMP* to obtain the password for its customer from the *Metering Provider*, and to schedule its customer's access to the *metering data* in the metering installation through the *responsible person*, to ensure visibility of all parties directly accessing *metering data* from metering installations.

Rule Change Proposal No.14

The draft new clause 7.11.2(ae) allocates the responsibility for meeting the costs for replacing broken seals to the *Registered Participant* or the *responsible person* only.

There are situations where the *Metering Provider* may have broken seals for maintenance or other purposes and failed to replace the seals following completion of the work.

In some cases, the *Metering Provider* may have been engaged by the *Financial Responsible Market Participant* and may not therefore have a commercial relationship with the *responsible person*.

Hence, clause 7.11.2(ae) should include another option inserted before part (3) as follows:

"(2a) by the *Metering Provider* if the seal was broken by the *Metering Provider*; or"

Rule Change Proposal No.20

The re-drafted clause S7.2.6.1(g) does not include a reference to AS1243 to provide for three phase inductive voltage transformers which are not covered by the AS60044 series of Australian Standards.

It is recommended that S7.2.6.1(g) be amended to include a reference to AS1243.

Rule Change Proposal No.23

The rationale and relativities to the other S7.2.3.n tables for the proposed new table S7.2.3.6 are not fully evident in the material included in the rule change proposal.

For example, it would appear that an additional 0.5% overall error allowance at full load is provided between Type 5 and Type 6 metering installations to allow for the use of a CT connected *General Purpose meter* for Type 6 metering installations. This extra 0.5% seems also to apply for the 50% load and unity power factor test point, which is consistent, but does not appear to apply for the 50% 0.5 pf lagging and the 10% unity power factor test points. In fact, the Type 6 50% 0.5 pf lagging test point overall error allowance is tighter (2.0%) than that allowed for the Type 4 and 5 metering installations (2.5%).

It is also noted that overall errors have also been specified in table S7.2.3.6 for 10% and 100% load 0.5 pf test points, whereas tables S7.2.3.2-5 have these test points listed as not applicable. Is this a mistake or is there some rationale for why Type 6 metering installations should have additional requirements that the Types 1-5 metering installations do not have?

It is suspected that Table S7.2.3.6 was intended to be shown as:

% Rated Load	Power Factor		
	Unity active	0.866 lagging active	0.5 lagging active
10	3.0%	n/a	n/a
50	2.0%	n/a	3.0%
100	2.0%	n/a	n/a

Rule Change Proposal No.24

The proposed amended table S7.3.1 would appear to include an error for the "In Field" "Class 2.0" "Meters Wh" table entry. The maximum allowable level of testing uncertainty is shown as $0.3/\cos \Phi \%$, however, class 2.0 Wh meters do not meet the minimum requirements for any metering installation in Table S7.2.3.1. The only class 2.0 meters permitted in Table S7.2.3.1 are Class 2.0 varh meters.

Therefore, it would seem appropriate that the "In Field" "Class 2.0" "Meters Wh" Table S7.3.1 entry should read "n/a".