Western Power
Metrology Procedure Consultation Response

***Participant**:* *AGL*

***Submission Date**:* *14 December 2021*

Contact: *Mark Riley*

Dear Sir/Madam

AGL submission on Western Power Metering procedure

AGL is a

Please find attached our comments in relation to the Western Power Meter Procedure consultation.

We have based our comments largely on expected market developments, such as the changes which will be required for Demand Management, which is expected to see the role of Demand Aggregator come into being at some point, and the experience of making changes to the NEM Metrology in preparation for the introduction of Five-Minute Settlements and Global Settlements.

Attachment A

Section	Description / Issue	Proposed Drafting
1.2.2(b)	The scope refers to energy data but not metering data. As the party responsible for the metering installation and security, management and reading of the installation's data, metering data should be part of WPs scope.	(b) sets out those obligations and duties that are imposed on *Western Power* with regards to *energy* and *metering* *data* provision by the *Code* and *market rules*
Definition	The procedure recognises **retailers** as relevant participants but does not seem to consider other participants (such as demand aggregators) who may also be parties to meter data and may make requests meter data or for upgrades to metering installations.	
Definition Five-minute …	This procedure uses 'five-minute' and '30-minute' to define metring intervals under one drafting standard, but has not changed Type1-7 metering to Type One -Seven under that drafting standard. Suggest that s this is a technical document – that Five-Minute be drafted as 5-minute.	

Section	Description / Issue	Proposed Drafting
Definition Interval energy data	The definition is convoluted as it refers to types of interval energy, but does not define what interval energy is and how it differs from interval meter data.	Energy data The data that results from the measurement of the flow of electricity in a power conductor where the data is prepared and recorded and held by the metering installation. Meter Data The energy data, once collected from a metering installation and which is held in a metering data services database and the metering database. interval metering data The interval energy data, once collected from a metering installation, is interval metering data. Interval metering data is held in a metering data services database and the metering database.
Definition Metering Interval	Definition is largely circular as the definition refers to two types of metering intervals but doesn't define what a metering interval is.	Metering Interval The period of time in which energy consumption or production is accumulated by the meter.

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Definition Registered Metering Installation Provider	The definition defines a **registered person** as a person who has not been de-registered. This seems convoluted as a person who is de-registered is by definition not registered.	Options means a person registered by ….. *metering installations*~~, and who has not been deregistered under the *registration process*~~. Or means a person currently registered by ….. *metering installations*~~, and who has not been deregistered under the *registration process*~~.
Definition Type 7	The current definition is unnecessary as it simply refers to another definition without adding value. Further, this definition blurs the separation between connection points and metering points.	Type 7 A virtual metering installation for an unmetered connection point where the energy data is calculated using the processes defined in Section 9. Or The process used to produce energy data for an unmetered connection point as defined in Section 9.
2.1.2	Given the move to roll out AMI meters, suggest that the reference to pre-payment meters being type 6 be amended or deleted.	
2.2.3	Note that under 5-minute settlement, the type 4 time discrepancy is equivalent to 6.66% discrepancy. Given a type 4 meter can record consumption up to 750MWh, this error can equate to 50MWh. Suggest that the time discrepancy be reviewed for large type 4 meters.	

Section	Description / Issue	Proposed Drafting
2.2.4	Load is defined but generation is not defined, although generator is.	Generation The production of electrical power by converting another form of energy in a generating unit.
2.2.5	Do not agree that a reduced consumption means that a meter change is unnecessary. Meters are designed to be accurate within a specific load range. If the load is too low, the meter (and CT/VTs) may no longer be accurate or appropriate for the load it is measuring.	Suggest: …..*meter* upgrade. Where annual consumption and/or production has decreased with time ~~no *meter* change is necessary~~ a meter change may not be necessary.
2.2.6	The original drafting implies that a type 6 meter may be capable of providing interval data, which by definition it shouldn't be capable of. Should those words be deleted ? It seems more broadly that this clause is saying that a non-contestable customers metering will be accumulation, unless otherwise agreed.	Where a meter, whether a Type 4 or Type 6 meter, associated with a non-contestable customer is capable of recording…… and the retailer.

Section	Description / Issue	Proposed Drafting
2.2.6	Given the move to demand programs, 5-minute market, solar PV generation etc, it would make more sense to provide interval data to the market where that is possible. In the interests of improved forecasting by retailer and improved understanding of customer load, it is suggested that where meters are capable of interval data collection, that the interval data be provided to the retailer, who can choose how the data is used for billing. It is the retailers responsibility to determine what product is used and whether they provide the customer interval or accumulation data.	
2.2.7	Grammar Comma after wrong word	the meter will not be replaced by, or~~,~~ reconfigured to, an interval-read meter without the agreement of the ie – '…not be replaced by, or reconfigured to, an…'
2.2.7 (b)	AGL notes that the reprogramming of a customer meter prior to transfer provides an alert to the incumbent retailer that the customer is about to transfer, which is likely to result in the incumbent undertaking 'save' actions. The completion of reprogramming could be used as the final trigger for transfer.	

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2.3.1	This section covers the testing of meters only, not associated metering installation equipment, from fuses to CT/VTs to modems. If secondary equipment is identified as failing outside acceptable limits, and impacts the collection, storage and communication of metering data, then those assets should be considered within the sampling and test plans, to form part of any asset replacement strategy.	2.3.1.1 *Western Power* will ensure that *meters* and associated equipment on its *network* are sampled and…… 2.3.1.2 Western Power will ensure that its meters and equipment meet the specifications and/or guidelines outlined by the National Measurement Institute under the National Measurement Act or other code or requirements.
2.3.2	Per above, the obligations to metering installation equipment repair/replacement is noted, but this does not mean that the equipment is managed under an appropriate asset strategy.	
2.3.4	Note this applies only to meters, and not secondary equipment (eg modems).	2.3.4.1 Where a population of meters and associated equipment has been sampled and tested in accordance with section 2.3.1.1 and deemed to have failed, Western Power will remove and replace all meters and/or associated equipment within that population in accordance with the requirements of the Code.

Section	Description / Issue	Proposed Drafting
3.1.6	Convoluted obligation – as it mixes up the connection point type with the metering data obligation. The connection point is unmetered and the energy calculation is undertaken using Type 7 processes. Further, the use of the term 'unmetered Type 7 connection point' implies that there may be metered Type 7 connection points or unmetered type 1-6 connection points. If there is differentiation between unmetered supplies where the load is defined (eg street lights) compared to agreed load (eg council equipment), then additional clauses should be added to clarify the processes for those connections.	3.1.6 Western Power will ensure that for unmetered ~~Type 7~~ connection points, Type 7 energy data is calculated, validated and substituted in accordance with the Code.
3.1.7	Note previous comments about capability versus designation. Note also previous change in to include type 4 meters in Cl2.2.6.	3.1.7 Where a ~~Type 6~~ *metering installation*, designated as Type 6, is capable of recording both interval and *accumulated energy data,* it will be treated as an *accumulation meter,* unless otherwise agreed between *Western Power* and the *retailer.*
3.1.8	Noted that this clause covers accumulation of sub-intervals to a higher metering interval. However, there seems to be no clause that covers meters which accumulate energy at a greater frequency than the metering interval and profiles the data – eg collecting 15 or 30 minute data and profiling it to 5 minute data.	
3.2	Note that these clauses largely refer to retailers and do not contemplate other participants, such as demand aggregators, needing / requesting meter data, etc.	

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3.2.2	Unclear statement (final edit) accordance with the published *meter* reading schedule, the applicable *service level agreement.* Is the schedule in the applicable SLA or is this clause meant to mean the schedule **or** the applicable SLA ?	
3.3.4	Grammar For acronyms like AEMO which are spoken as a word, the use of 'the' before the acronym is generally only used when the acronym is spelt out – eg the RP.	After conducting a meter reading and obtaining energy data for a metering point, Western Power will provide access to that energy data to the user for the metering point and ~~the~~ AEMO in accordance with clauses 5.6 and 5.7 of the Code and in accordance with the Communication Rules.
3.4 / 3.5	Noting that there are different validation and substitutions used for Types 1-5 and Type 6 designated meters. If the meter data is collected as interval meter data, prior to being provided to market as accumulation energy data, is the meter data validated and substituted as interval meter data prior to being converted to accumulation energy data or is it substituted and validated as accumulated meter data ?	

Section	Description / Issue	Proposed Drafting
3.5.5	Convoluted obligation – as it mixes up the connection point with the energy data obligation. Type 7, by definition is a calculation of energy for an unmetered connection point. *Type 7* has the same meaning in this Metrology Procedure as the meaning *unmetered connection point.* *UMS /* Unmetered Supply has the same meaning in this Metrology Procedure as the meaning *unmetered connection point.* *unmetered connection point* has the same meaning in this Metrology Procedure as the meaning given to it in the Code: means a (unmetered supply) *connection point* associated with one or more of the following loads— a) street, traffic, park, community, or security lighting; or b) ticket issuing machines, parking meters, or community watering systems; or c) telephone service requirements; or {Example: Telephone service requirements may include telephone boxes, fibre optic cable routers and devices that connect pay television services.} d) *loads* consuming less than the starting electric current of a *meter;* or ~~a)~~e) other *loads* or a similar nature.	Street lighting and all UMS installations are classified as unmetered ~~Type 7~~ connection points and the Type 7 energy data is estimated using the following calculations:

Section	Description / Issue	Proposed Drafting
3.5.5		Western Power will ensure that for unmetered ~~Type 7~~ connection points, Type 7 energy data will be calculated on a monthly or bi-monthly basis in accordance with the Communication Rules Build Pack and specifically, the Streetlights and UMS Data CSV File Specification documents included within the Build Pack.
3.5.8	Note that this clause only relates to retailer consultation, and does not contemplate other relevant participants, such as Demand Aggregators etc.	
3.6.1 3.6.5	Note that this clause does not contemplate other participants, such as a Demand Aggregator.	
4.2.13	The reference to Appendix 1, Table 3A, column 4 is very specific, and would lead to a new consultation / code and procedure release if the appendix in this standard is modified in any way. Suggest that this specific detail is contained within a note referencing AS 1284.12.	ie, something like: …tested in accordance with AS 1284.12. Note: The test specifications are detailed in AS 1284.12 YYYY, Appendix 1, Table 3A, Column 4, Minimum acceptable class or standard of components
7.1.1	Noted that this clause covers accumulation of sub-intervals to a higher metering interval. However, there seems to be no clause that covers meters which accumulate energy at a greater frequency than the metering interval and then profile the data to a 5-minute interval – eg collecting 15 or 30 minute data and profiling it to 5 minute data.	
9	See previous comments on connection points versus metering processes	Suggest rename to Type 7 Validation, Substitution and Estimation

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9.1.1	The connection point is an unmetered point, the energy data is calculated in accordance with Type 7 processes. Suggest maintaining separation between connection type and energy data processes.	Suggest: The substitution and estimation types detailed in clauses A3.6 and A3.7 of Appendix 3 of the Code are to be undertaken by Western Power for the calculation, substitution and delivery of metering data from an unmetered ~~Type 7~~ connection point.
9.1.2	See above	Nothing in this Metrology Procedure requires Western Power to modify or change unmetered ~~Type 7~~ connection points with Type 7 consumption calculations agreed between Western Power and Synergy on 16 May 2013. T
9.1.2	See above	The metering installation and metering database associated with each unmetered ~~Type 7~~ connection point are the systems in use as at 16 May 2013 or unless as otherwise agreed between Synergy with customers with unmetered ~~Type 7~~ connection points and Western Power.
9.2.4	See above	Western Power must base calculated Type 7 metering data for unmetered ~~Type 7~~ connection points in accordance with the Communication Rules Build Pack a
9.4.1	See above	Western Power must validate the Type 7 calculated metering data on registration of all unmetered ~~Type 7~~ connection points to verify consistency

Section	Description / Issue	Proposed Drafting
Appendix 3 Tables	The electricity production is shown in the tables in brackets, which is presumed to indicate negative numbers (ie relative to consumption which is positive). However, the where the column is titled Net Production, which by definition and title would be generation of energy into the network, numbers in this column would indicate the quantities flowing into the network and would therefore be positive. Showing them as negative might indicate that the production was flowing into the customer site, in much the same way that table 4 is showing a negative against phase 3 to indicate generation rather than load on phase 3. Suggest some notation be included to ensure clarity of the examples.	