

Metering Code
Model Service Level Agreement and Metrology Procedure

Report on Development and Consultation Process

19 November 2021

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Introduction

- 1 Peel Renewable Energy (**PRE**) operates the microgrid at Peel Business Park, Nambeelup, Western Australia, which comprises electricity network assets, a solar array and battery energy storage system. The microgrid is directly connected to the Western Power network and presently services fewer than ten customers.
- 2 PRE holds Electricity Distribution Licence 7 in respect of the network component of the microgrid and, as a consequence, is subject to certain obligations under the *Electricity Industry Metering Code 2012 (WA)* (**Metering Code**).
- 3 PRE submitted the accompanying proposed Metering Code Model Service Level Agreement (**Model SLA**), Metrology Procedure and Registration Process for approval by the Economic Regulation Authority (**ERA**) on the date of this report.
- 4 Under clause 6.11(3) of the Metering Code, prior to submission of a Model SLA and Metrology Procedure, the network operator must provide a report to the ERA which describes the process followed for its preparation and provides details of the consultation process with stakeholders leading to the submission of the Model SLA and Metrology Procedure.
- 5 Clause 6.11(1) of the Metering Code provides that clause 6.11 of the Metering Code does not apply in respect of a proposed Registration Process. PRE therefore notes its submission to the ERA of a Registration Process but does not otherwise address that document in this report.
- 6 Given the scale of the microgrid, PRE has sought to avoid an overly cumbersome set of regulatory documents while retaining minimum content required to satisfy the Metering Code.

Metering Code Requirements

- 7 This report has been prepared in accordance with the Metering Code.
- 8 The applicable Metering Code requirements are set out below:

Consultation with Code Participants

- 9 Clause 6.11(2) of the Metering Code requires that, before submitting a proposed document to the ERA under clause 6.2, a network operator must:
- 9.1 give Code Participants a reasonable opportunity to make submissions to the network operator concerning the proposed document; and
 - 9.2 take into account any submissions received from Code Participants in developing the proposed document.
- 10 Clause 6.11(3) of the Metering Code requires that, before submitting a proposed document to the ERA under clause 6.2, a network operator must provide a report to the ERA that:
- 10.1 identifies the process through which the proposed document was developed, including details of consultation with Code participants;
 - 10.2 describes how the proposed document complies with the criteria set out in clauses 6.5 to 6.9 (as applicable);
 - 10.3 describes how the network operator took into account any submissions received from Code Participants; and
 - 10.4 includes copies of submissions received by the network operator from Code Participants.

General Requirements for Documents

- 11 Clause 6.5 of the Metering Code states that, as requirements for all documents, a document must:
- 11.1 comply with the Metering Code;
 - 11.2 not impose inappropriate barriers to entry to a market;
 - 11.3 be consistent with good electricity industry practice;
 - 11.4 be reasonable;
 - 11.5 be consistent with the Metering Code objectives;
 - 11.6 be consistent with the market rules; and
 - 11.7 unless the Metering Code requires otherwise, be consistent with other enactments.

Requirements for a Model Service Level Agreement

- 12 Clause 6.6 of the Metering Code contains the requirements for a model service level agreement. In particular a model service level agreement must at least:
- 12.1 specify the metering services that the network operator:
 - 12.1.1 must provide (at least all the metering services that the Code, Code of Conduct and the Customer Transfer Code require the network operator to provide); and
 - 12.1.2 may provide,
to other Code Participants on request;
 - 12.2 for each metering service specify:
 - 12.2.1 a detailed description of the metering service; and
 - 12.2.2 a timeframe, and where appropriate other service levels, for the performance of the metering service,
 - 12.3 specify the maximum charges that the network operator may impose for each metering service;
 - 12.4 if any of the charges is variable, provide details of the methodology and cost components that will be used to calculate the variable charge including (where applicable) hourly labour rates, distance-related costs and equipment usage costs;
 - 12.5 provide that the charges which may be imposed under a service level agreement may not exceed the costs that would be incurred by a network operator acting in good faith and in accordance with good electricity practice, seeking to achieve the lowest sustainable costs of providing the relevant metering service;
 - 12.6 require the network operator to publish, annually, a list setting out for each metering point on the network either:
 - 12.6.1 each date for a scheduled meter reading in the coming year; or
 - 12.6.2 the reading day number to apply for the current year,and specify the procedures by which, and frequency with which, this list may be revised; and
 - 12.7 specify the procedures for a Code Participant to make a request for metering services (metering service order) and the procedures for dealing with a metering service order.

Requirements for a Metrology Procedure

- 13 Clause 6.8 of the Metering Code contain the requirements for a metrology procedure.
- 14 A metrology procedure must at least:
 - 14.1 as a minimum, contain information on the devices and methods that are used by the network operator to:
 - 14.1.1 measure, or determine by means other than a device, electricity produced and consumed at a metering point;
 - 14.1.2 convey the measured or determined information to other devices using communications links;
 - 14.1.3 prepare the information using devices or methods to form energy data; and
 - 14.1.4 provide access to the energy data from a telecommunications network;
 - 14.2 specify the minimum requirements for meters and metering installations, including:
 - 14.2.1 accumulation meters;
 - 14.2.2 interfaces that allow interval energy data to be downloaded;
 - 14.2.3 direct connected meters for Type 4 to Type 6 metering installations;
 - 14.2.4 CTs and VTs; and
 - 14.2.5 programmable settings;
 - 14.3 specify the procedures for estimating, substituting and validating energy data under the Metering Code;
 - 14.4 provide for the sampling and testing of meters for the purposes of and in accordance with clause 3.11A(1); and
 - 14.5 specify the date from which the metrology procedure takes effect which must be no less than 3 months after it is published.

Process of Preparation, Consultation and Approval

- 15 Clause 6.11(2) of the Metering Code requires that, before submitting a proposed document to the ERA under clause 6.2, a network operator must:
- 15.1 give Code Participants a reasonable opportunity to make submissions to the network operator concerning the proposed document; and
 - 15.2 take into account any submissions received from Code Participants in developing the proposed document.
- 16 Clause 6.11(3) of the Metering Code requires that, before submitting a proposed document to the ERA under clause 6.2, a network operator must provide a report to the ERA that identifies the process through which the proposed document was developed, including details of consultation with Code Participants.
- 17 In accordance with clauses 6.11(2) and 6.11(3) of the Metering Code, the process for developing the Model SLA and Metrology Procedure including details of consultation with Code Participants, were as follows:

Date	Step	Responsibility
Prior to 07/09/2021	PRE prepared the Model SLA and Metrology Procedure while engaging in detailed consultation with Synergy, which is PRE's provider of meters and metering services.	PRE
07/09/2021	PRE emailed the Model SLA and Metrology Procedure to the following Code Participants for comment: <ul style="list-style-type: none"> a) Australian Energy Market Operator (AEMO); b) Western Power; c) Synergy; d) Alinta Sales; e) Amanda Energy; f) Blair Fox Energy Retail; g) Blue Star Energy; h) Bluewaters Power 1; i) Change Energy; j) CleanTech Energy; k) Clear Energy; l) Metro Power Company; m) Perth Energy; n) Shell Energy Retail; o) Southern Cross Energy Partnership; 	PRE

	<p>p) Southern Energy WA; and q) Wesfarmers Kleenheat Gas.</p> <p>In its cover letter, PRE advised the Code Participants of the requirement under the Metering Code to provide them with a reasonable opportunity to make submissions and invited the Code Participants to comment on the Model SLA and Metrology Procedure.</p>	
22/09/2021	<p>PRE received the following response from the Principal Lead – Operations, Market Operations (WA) at AEMO pertaining to the Model SLA and Metrology Procedure:</p> <p><i>“Thank you for your letter dated 7 September 2021. AEMO have reviewed the proposed Model Service Level Agreement and Metrology Procedure (Proposed Documents) and, at this time, does not intend to make a submission with respect to the Proposed Documents. AEMO would like to reserve the right to make a submission on future amendments to the Peel Renewable Energy Model Service Level Agreement and Metrology Procedure.”</i></p>	Code Participants
07/09/2021 –	<p>No further submissions or comments have been received from Code Participants relating to the Model SLA and Metrology Procedure and no further amendments have therefore been made to these documents at this stage.</p>	PRE

18 Having given Code Participants with a conceivable interest in the microgrid an opportunity to make submissions in respect of the Model SLA and the Metrology Procedure, PRE considers that it has complied with the consultation obligations required of it under the Metering Code.

Compliance with criteria set out in clause 6.5 of the Metering Code: General Criteria

The Model SLA and the Metrology Procedure comply with the requirements prescribed in clause 6.5 of the Metering Code for all documents, in the following respects:

19 Compliance with the Metering Code

19.1 Both documents comply with the Metering Code, in that:

- 19.1.1 the Model SLA comply with the requirements for a model service level agreement set out in clause 6.6 of the Metering Code, as discussed below;
- 19.1.2 the Metrology Procedure complies with the requirements for a metrology procedure set out in clause 6.8 of the Metering Code, as discussed below;
- 19.1.3 PRE complied with its requirements in clause 6.11(2) of the Metering Code requiring that, before submitting a proposed document to the ERA under clause 6.2, PRE gave Code Participants a reasonable opportunity to make submissions in respect of the proposed documents. As noted above, no submissions were received by PRE in respect of the process; and
- 19.1.4 the Model SLA and Metrology Procedure complied with the requirements in clause 6.11(3) of the Metering Code which requires that a report be provided to the ERA that identifies the process through which the proposed documents were developed, including details of consultation with Code Participants, as discussed above. This document is that report.

20 Imposition of inappropriate barriers to entry to a market

PRE considers that the Model SLA and the Metrology Procedure do not impose inappropriate barriers to entry to the market.

21 Consistency with good electricity industry practice

PRE considers that the Model SLA and Metrology Procedure are consistent with good electricity industry practice.

22 Reasonableness

PRE considers the Model SLA and Metrology Procedure are reasonable.

23 Consistency with the Metering Code objectives

PRE believes the Model SLA and Metrology Procedure to be consistent with the Metering Code objectives in that the documents are reasonable and consistent with the Metering Code.

24 Consistency with the market rules

PRE believes the Model SLA and Metrology Procedure to be consistent with the Wholesale Electricity Market Rules.

Compliance with criteria set out in clause 6.6 of the Metering Code: Model SLA

The Model SLA complies with clause 6.6 of the Metering Code as it meets all of the requirements set out in that clause. In particular:

Requirements for the Model SLA	Where in the Model SLA
It specifies the metering services that PRE must provide to other Code Participants	Clause 3.1 of the Model SLA
It specifies the metering services that PRE may provide to other Code Participants on request	Clause 3.3 of the Model SLA
It specifies for each metering service a detailed description of the metering service	Schedule 2 of the Model SLA
It specifies for each metering service a timeframe and other service levels for the performance of the metering service	Schedules 2 and 3 of the Model SLA
It specifies the maximum charges that PRE may impose for each metering service	Schedule 4 of the Model SLA
Where the charges are variable, it provides details of the methodology and cost components that will be used to calculate the variable charge including hourly labour rates, distance-related costs and equipment usage costs	Schedule 4 of the Model SLA
It provides that the charges which may be imposed under the Model SLA may not exceed the costs that would be incurred by a network operator acting in good faith and in accordance with good electricity practice, seeking to achieve the lowest sustainable costs of providing the relevant metering service	Clause 5 of the Model SLA
<p>It requires PRE to publish, annually, a list setting out for each metering point on the network either:</p> <ul style="list-style-type: none"> • each date for a scheduled meter reading in the coming year or • the reading day number to apply for the current year, <p>and specify the procedures by which, and frequency with which, this list may be revised</p>	Clause 3.6 of the Model SLA
It specifies the procedures for a Code Participant to make a request for metering services (metering service order) and the procedures for dealing with a metering service order	Schedule 2 of the Model SLA

Compliance with criteria set out in clause 6.8 of the Metering Code: Metrology Procedure

The Metrology Procedure complies with clause 6.8 of the Metering Code as it meets all of the requirements set out in that clause. In particular:

Requirements for a metrology procedure	Where in the Metrology Procedure
<p>It contains information on the devices and methods that are used by PRE to:</p> <ul style="list-style-type: none"> • measure, or determine by means other than a device, electricity produced and consumed at a metering point • convey the measured or determined information to other devices using communications links • prepare the information using devices or methods to form energy data • provide access to the energy data from a telecommunications network 	<p>Clause 3 of the Metrology Procedure</p>
<p>It specifies the minimum requirements for meters and metering installations, including:</p> <ul style="list-style-type: none"> • accumulation meters • interfaces that allow interval energy data to be downloaded • direct connected meters for Type 4 to Type 6 metering installations • CTs and VTs • programmable settings 	<p>Clause 3 of the Metrology Procedure</p>
<p>It specifies the procedures for estimating, substituting and validating energy data under the Metering Code</p>	<p>Clause 5 of the Metrology Procedure</p>
<p>It provides for the sampling and testing of meters for the purposes of and in accordance with clause 3.11A(1)</p>	<p>Clause 6 of the Metrology Procedure</p>
<p>It specifies the date from which the Metrology Procedure takes effect which must be no less than 3 months after it is published</p>	<p>Clause 1.3 of the Metrology Procedure</p>

Code Participant Submissions

- 25 PRE attaches the following comments received from Code Participants during the development and consultation process to this report:
 - 25.1 email from AEMO dated 22 September 2021 advising that it did not intend to make a submission with respect to the Model SLA and Metrology Procedure, but that it reserved its right to make a submission on future amendments to those documents.

Subject: FW: Consultation- Proposed model Service Level Agreement and Metrology Procedure
Date: Wednesday, 22 September 2021 at 3:18:50 pm Australian Western Standard Time
From: Renee Darge
To: Luke O'Callaghan
CC: Mareli Treurnicht
Attachments: image002.jpg, image003.png, image004.png, image005.png, image006.png, image001.jpg

Hi Luke

Please see below email.

Regards

Renee Darge
Secretary



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Western Australians
for more than 120 years

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Lavan respectfully acknowledges the traditional owners of the land on which we live and work.

From: Rick Dolling <Rick.Dolling@aemo.com.au>
Sent: Wednesday, 22 September 2021 3:18 PM
To: Renee Darge <Renee.Darge@lavan.com.au>
Cc: WA Market Operations <wa.operations@aemo.com.au>
Subject: RE: Consultation- Proposed model Service Level Agreement and Metrology Procedure

Hi Renee,

Thank you for your letter dated 7 September 2021. AEMO have reviewed the proposed Model Service Level Agreement and Metrology Procedure (Proposed Documents) and, at this time, does not intend to make a submission with respect to the Proposed Documents. AEMO would like to reserve the right to make a submission on future amendments to the Peel Renewable Energy Model Service Level Agreement and Metrology Procedure.

Regards,

Rick Dolling
Principal Lead - Operations, Market Operations (WA)
Australian Energy Market Operator
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From: Renee Darge <Renee.Darge@lavan.com.au>
Sent: Tuesday, 7 September 2021 12:12 PM
To: AEMO Information & Support Hub <Support.Hub@aemo.com.au>
Subject: Consultation- Proposed model Service Level Agreement and Metrology Procedure

Dear Sirs

Please see **attached** correspondence, with enclosure dated 7 September 2021 from Rob Breden.

Regards

Renee Darge
Secretary



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