

# Power of Choice Procedures Working Group

## 15 and 16 February 2016 Workshop

### Meeting notes

#### 36 Attendees

<b>Name</b>	<b>Company</b>
Brendan Ring	AEMO (Chair)
Lee Brown	AEMO
Noura Elhawary	AEMO
Roy Kaplan	AEMO
David Ripper	AEMO
Tim Sheridan	AEMO
Robert Speedy	AEMO
Doug Miles	Energex
Karly Train	Energy Australia
Georgina Snelling	Energy Australia
Tony Woolfe	Essential Energy
Inger Wills	IntelliHub
Mara Tennis	Lumo/Red Energy
Aakash Sembey	Momentum Energy
Darren Bailey	Origin
Camille Hymer	Pacific Hydro
David Woods	SA Power
Lance McMinn	Secure Australasia
Marcus Hankey	Select Solutions
Umesh Dutt	Service Works
Nichole Chaplin	United Energy
Verity Watson	United Energy
Opal Russ	Vector
Ty Crowhurst	Tas Networks
Kam Vessali	Power S Water
David Rofe	Citi Power
Justin Betlehem	Ausnet Services
Vishal Saini	Jemena
Jeff Roberts	ActewAGL
Helen Stimpson	Active Stream
Mark Riley	AGL
Stephen Zok	Augrid
Peter Ellis	Ausnet Services
Carlos Navarro	Ched Services
Brendan McEntee	Endavour Energy
Tom Cole	Energex

## **Important Note**

The intent of this document is to capture the commentary in summary form, from the POC Procedures Working Group (POC-PWG) workshop held over 15<sup>th</sup> and 16<sup>th</sup> February 2016. The topics under discussion were led by the slides provided for the day and were presented by AEMO representatives. The information on the slides is not reproduced here, nor are the comments provided to the slides from the presenter, save for comments provided to summarise a discussion or in direct response to a question from an attendee.

Please note that procedure changes must be made in accordance with the NER Rules consultation procedures and therefore, all matters discussed at workshops and other meetings will be considered by AEMO and will assist in AEMO forming a position on various subjects but should not be taken as a representation, warranty or agreement, express or implied, as to the final procedure changes.

## **Purpose of the Workshop**

As a result of the final determination of Metering Competition and Embedded Network, AEMO needs to update existing Procedures or create new ones. The aim of the workshop is not to litigate the rules, but rather to focus on topics where AEMO needs further input and information from stakeholders to update the Procedures. The assumption is that the audience of the workshops has reasonable amount of expertise on the topics discussed in the workshop. Topics will be presented based on the presentation slides followed by an open discussion on each topic without time limits. Once the topic is discussed a summary will be provided to the audience at the end of each topic. If new topics come up which are not included in the meeting agenda then they might be considered as future topics in future workshops.

Some of the topics which are discussed in the workshop are related to B2B requirements and are clearly identified as such in the notes below. The outcome of those discussions will be summarised and provided as reference material for the Information Exchange Committee to consider with regard to changes to the B2B procedures.

## **Topics under Discussion**

1. MSATS Requirements
  - a. Change Request Codes
  - b. Objection Code Review
2. B2B requirement – Life Support
3. B2B Requirement – Retailer Planned Interruption
4. ROLR requirements - Metering Coordinator Appointment
5. Network Tariff Code Updates

## **Topic 1: MSATS Requirements**

### **a. Change Request Codes**

*Do stakeholders have views on the position for RP versus MC in MSATS?*

- AEMO stated that the purpose of the proposal to keep 'RP' role ID as a reference to the metering coordinator and not changing it to 'MC' is based on a principle of low-to-no impact on the market, as the Metering Coordinator functions in MSATS are quite similar to the current functions of the RP.
- AEMO stated that in the browser the 'RP' role ID can change to appear as 'MC' and the description of the Role ID 'RP' can be changed to 'Metering Coordinator', however in the database and in the XML transactions the role ID will still be 'RP', meaning no system changes for participants, providers and AEMO.
- AEMO stated that if the 'RP' role ID changes to 'MC', this cannot be done using Bulk Change Tool or change request and instead it would need to be performed as a coordinated industry update where every party in the market updates their systems at the same time. AEMO highlighted that opting to make such a change at a point in time where other changes will be required to systems and processes would add risk and that any rationale to change would need to be substantive.
- Some stakeholders were not in favour of keeping the role id as 'RP' in MSATS and not changing it to 'MC' for various reasons, including:
  - Changes are required from RP/Responsible Person to MC/Metering Coordinator in all the procedures, so why keeping RP in MSATS – it could lead to confusion in the market.
  - Based on previous discussions with the AEMC some stakeholders proposed that instead of introducing a new role called "Metering Coordinator" in the Rules which has similar obligations to the current role of the "Responsible Person" plus other new obligations, to keep the role name of "Responsible Person" and redefine its obligations in the Rules. However the AEMC didn't consider this proposal as there was sufficient reason to have new role of "Metering Coordinator" mainly for consistency, Stakeholders stated that we need to be consistent with the AEMC and have the role called "MC" in MSATS.
  - Stakeholders stated that if they are going to implement many changes in MSATS anyway as part of Metering Competition and Embedded Network rule changes then it makes sense to also implement the change from 'RP' to 'MC'.
- Stakeholders have questioned whether AEMO has considered legal advice on whether it is possible to keep 'RP' role ID in MSATS to reference Metering Coordinator? AEMO responded that in MSATS the role of the Metering Coordinator can be called anything - 'RP', 'XYZ', etc., as the role description, the participant ID, its obligations and what it can do in MSATS is what matters.
- Stakeholders also have questioned what will happen to historical records and retrospective transactions? AEMO stated that MSATS is a retrospective system and it will be able to validate which participant ID can be in which role. AEMO also stated that regardless of the solution chosen, MSATS will always be able to keep track of historical records.
- An alternative solution was discussed - leave RP in the system end date the role, and add new role of MC, however this option was considered rather complex, is likely to be confusing and needs a lot of analysis to decide how it is going to work, or if it could work.

### *Summary*

- A summary of view expressed for AEMO to consider were as follows:
  - Keep using RP role ID to reference Metering Coordinator in MSATS, for low-to-no system cost and no impact on market operation - noting that the term 'RP' is redundant and is not intuitive under the new MC arrangements.
  - Add new role ID 'MC' to MSATS, keep the old role id of 'RP' but end date it in the system to make it obsolete when the rule change is effective - stakeholders found this option quite messy and there was uncertainty in terms of how it could work.
  - Rename 'RP' role ID to 'MC' which will require a coordinated industry update on 1/12/17, would require all stakeholders and AEMO to make associated changes and adds risk as a result – noting that some stakeholders were in favour of this option to remove any potential for confusion to the market in the future between the RP and MC terms.

### *Do stakeholders have views on the position for ENM/LNSP in MSATS?*

- Views were expressed that the role of the ENO appears closer to the role of the LNSP than the ENM is, and hence it doesn't make sense to use the LNSP field to contain the ENM role. AEMO clarified that in MSATS the functions that the LNSP performs (i.e. create NMI, update NMI standing data, etc.) are similar, or the same, as the functions that the ENM is required to perform in MSATS and hence there is a logical argument to keep the ENM role in the LNSP field.
- Stakeholders questioned if we are to keep the role of the ENM in the LNSP field for child NMIs, how is the ENM role going to be listed for parent NMI where the LNSP has the DNSP or TNSP participant id? AEMO and Stakeholders discussed a possible solution of adding the ENM role to the parent NMI in the NSP2 field – AEMO noted that the ENM does not have rights of access to data for parent NMIs and as a result may have no role at all at the parent connection point.
- Stakeholders raised a question on how parent NMI can be linked to child NMIs in MSATS, how to identify the LNSP and ENM for the embedded network parent and child NMIs, they stated that this linkage and identification in MSATS is important for parties like MDP for example to identify who do they need to send the data to? LNSP or ENM for example? AEMO noted that embedded network parent and child connection points are linked in MSATS currently.
- Stakeholders stated that in the future it is expected that Embedded Networks will grow in numbers and that it will be necessary to identify who the ENO and the ENM is for each child NMI. AEMO suggested that the details of the ENO can be kept at the Embedded Network details level rather than the NMI level.

### *Summary*

- There was no strong objection raised to the idea of using LNSP field to contain the role of the ENM for child NMIs, however if that is going to be the solution the following needs to be considered:
  - The need to be able to link parent NMIs and Child NMIs in MSATS, and identify their embedded network.
  - The need to identify the ENM at the parent NMI of an embedded network – providing that the rules allow for this to occur.
  - Parties like MDP for example need to be able to determine whether to send NMI data to LNSP or ENM.
  - The need to identify the ENO and the ENM for each child NMI in the embedded network

### CR Codes Review

- The CR Codes discussed in this meeting are the standard NEM CR codes, other CRs related to Embedded Networks might be affected directly by this discussion. If AEMO identifies a specific need to discuss EN CRs further, they will be topics of the next workshop.
- As a result of the Metering Competition Rule change, the following CR Codes might not be required anymore, need modifications, or need to be repurposed.

CR	AEMO Comment / Question	Workshop Discussion Notes
1050 1051 Change Retailer – FRMP not RP – Large NMI	FRMP will never be MC. This CR can be removed as no longer relevant.	<ul style="list-style-type: none"> <li>• Stakeholders discussed that CRs 1050 and 1051 can be removed and that CR1000, 1010, 1020, etc. can be used to replace them if we are to remove validations related to FRMP must become RP for CR 1000, 1010, 1020 etc. (this was raised by some stakeholders as the preferred option)</li> <li>• Another option that was discussed is to rename and change the description of CRs 1050 and 1051 to “Change Retailer – FRMP not appointing MC – Large NMI”, and leave the role appointment of MP and MDP to the MC</li> <li>• A more generic solution was to review all the CR1000 series and try to simplify them by having only two CRs one for Prospective transfers and another for Retrospective transfers (e.g. 1000 and 1001).</li> </ul>
3080 3081 Maintain Metering – Advanced Change Metering installation details  – small or large	This CR supports the installation of VIC AMI devices. No longer relevant in current context – could be repurposed as an option for the MC.	<ul style="list-style-type: none"> <li>• The general view provided by stakeholders was for AEMO to consider repurposing this CR for use by the MC as suggested. .</li> </ul>
3090 3091 Maintain Metering – Advanced Exchange of Metering – small or large	This CR supports the installation of VIC AMI devices. No longer relevant in current context – could be repurposed as an option for the MC.	<ul style="list-style-type: none"> <li>• The general view provided by stakeholders was for AEMO to consider repurposing this CR for use by the MC as suggested.</li> </ul>
6200 6210	This CR may be consolidated for efficiency (e.g. CR 6800 amended)	<ul style="list-style-type: none"> <li>• Stakeholders agreed that CR 6800 can be modified to allow both the MC and current</li> </ul>

Change role – change MDP		FRMP to update multiple roles in a single transaction.
6700 6701 Change role – change MPB and / or MPC	This CR may be consolidated for efficiency (e.g. CR 6800 amended)	<ul style="list-style-type: none"> <li>Stakeholders agreed that CR 6800 can be modified to allow both the MC and current FRMP to update multiple roles in a single transaction.</li> </ul>

- Stakeholders raised a question about the review of CR2000 series Create NMI, and the possibility of modifying the CR to allow the LNSP to create a NMI without adding all the other roles (FRMP, MP, and MDP). AEMO confirmed that this will be considered.
- AEMO posed a question on whether stakeholders considered that the MSATS system should be very restrictive in terms of roles appointment and obligations, rather than be flexible to accommodate various commercial arrangements between stakeholders and providers (i.e. should the FRMP be able to appoint MP and MDP in MSATS or should we only allow the MC to appoint MP and MDP in MSATS?) Stakeholders indicated that both should be allowed, so FRMP can appoint the MP or MDP in MSATS and also the MC can appoint MP or MDP in MSATS depending on commercial arrangements (i.e. it should be flexible rather than restrictive for commercial arrangements).

## b. Objection Code Review

### *General discussion on objection codes*

- General discussion on the purpose of objection codes as follows:
  - To protect the business if a raised change request should not be completed in accordance with the rules
  - To protect commercial arrangements or the lack of commercial arrangements to the extent that the rules allow
- Further discussion highlighted when incoming or outgoing parties would wish to use an objection code:
  - Outgoing – to prevent the loss for a specific reason
  - Incoming:
    - Not capable of performing in the role proposed
    - Does not wish to perform the role proposed

Breaking the reasons down to this level and applying the logic of the new market dynamics may enable a fresh approach to be taken to the objection codes rather than a check for relevance against the current code list.

- Stakeholders raised an issue related to not finding or not being allowed to access and use an appropriate objection code to object to a CR, which leads to them using another objection code which is not quite suitable for the reason of their objection to object to the change request.
- Some Stakeholders proposed a generic solution to objection code issues, which is to have a generic list of objection codes and allow everyone to access the list and use any objection code where they need to use it.
- Stakeholders discussed that if objections codes are allowed to be used by everyone for whatever reason they need, this can create messy transactions, and some stakeholders might abuse the

use of those objection codes, and that in the past this issue was the main reason behind adding all the objection codes specifications to MSATS.

- Some stakeholders objected to the use of generic list of objection codes and allowing everyone to access it, because they don't have enough resources or time to correct mistakes of objections codes created by others who misuse them.
- AEMO discussed that another option for the use of objection codes would be to have a structure and specifications where this is required, and to leave it open for use by everyone where there are commercial arrangements.

*Is the code definition correct and clear?*

The following objection codes have been reviewed to determine if they are still required or if they need to be modified.

Objection	AEMO Comment / Question	Workshop Discussion Notes
BADDATA	When the roles have the responsibility for updating NMI standing data, why would they object?	<ul style="list-style-type: none"> <li>• Stakeholders noted that this objection code can be used by incoming new party or current party in a transposition scenario to object to incorrect standing data</li> <li>• Stakeholders agreed that the description of the objection code needs to be updated to include possible valid reasons for using it</li> </ul>
BADMETER	No longer relevant as churn rules have changed. Cannot be used in future.	<p>Stakeholders discussed the following scenarios where they can use this objection code:</p> <ul style="list-style-type: none"> <li>• MDPs noted that they use this objection code sometimes because they cannot access the other more appropriate objection codes, for example they use it to object to incorrect meter read type code.</li> <li>• MPs use this objection code to object to non-compliant meter when network use CR5050/CR5051 to change NMI classification from small to large</li> </ul>
BADPARTY	Why do we need to retain this objection code? For the current and the new RP/MC – under the new arrangements, they could use this code if incorrectly appointed, or alternatively manage this through a commercial process that the retailer	<ul style="list-style-type: none"> <li>• Stakeholders find this objection code useful as if the FRMP is the one filling in the roles for MP and MDP in MSATS CR, then the MC need to be able to use this objection code to object if the MP/MDP appointed are incorrect</li> </ul>



	can alter retrospectively if necessary, or update MSATS themselves.	<ul style="list-style-type: none"> <li>Stakeholders agreed that the description of the objection code needs to be modified</li> </ul>
DATEBAD	Principle of this objection codes appears sound – review appropriateness of timing.	<ul style="list-style-type: none"> <li>Stakeholders suggested new use for the objection code which is to add it as an objection code for CR1500 to allow MDPs to object to wrong dates provided by CR1500. This is an existing issue related to the removal of type 1-5 metering installations</li> </ul>
DEBT	If the jurisdictional requirements are still valid, then the codes appear reasonable. Review timing.	<ul style="list-style-type: none"> <li>Retailers indicated that this objection code is still valid and they need to keep it</li> <li>Stakeholders raised a question on whether MC should be able to use this objection code to protect themselves financially as part of a direct metering agreement with a large customer.</li> </ul>
DECLINED	Do we need this objection code? The MC is responsible for that, why do we need it? See BADPARTY above – same comments appear to apply in this case.	<ul style="list-style-type: none"> <li>Stakeholders discussed that this objection code is used by a party who doesn't want to perform the service or doesn't have the capability to do it.</li> <li>Stakeholders discussed that the descriptions of BADPARTY and DECLINED need to change to clearly differentiate between the two objection codes, as BADPARTY is used if the party is incorrectly nominated, however DECLINED is used if the nominated party doesn't want to perform the service or cannot do it.</li> </ul>
NOACC	Still appears relevant – no change suggested.	<ul style="list-style-type: none"> <li>Stakeholders discussed that this objection code should be added to the CR6800 to allow the MP/MDP to use it to object to the CR when a new site is won but the MP/MDP cannot get access to the site for various reasons. In the current world when this happens the MP/MDP contacts the retailer by phone, but in the new world with the mass market an automated process</li> </ul>



		using objection codes might be more efficient
NOTRESP	Rarely used. Do stakeholders consider that this is still needed?	<ul style="list-style-type: none"> <li>Stakeholders discussed that Embedded Network Managers are likely to be new users of this Objection code</li> <li>A general view was provided that this objection code is still required to allow parties nominated on NMI creation CR to object if they are not responsible for the NMI, particularly if the idea of a LNSP partly completing a create NMI CR is not carried forward.</li> </ul>
RETRO	Is this required? Seems to be covered by commercial agreement. If the procedure states that prior agreement is required by appropriate parties, then this code would not be required?	<ul style="list-style-type: none"> <li>General views were expressed that this is required regardless of commercial agreements, as there are a lot of operational errors that can occur and hence a retrospective transfer will need to be objected to.</li> </ul>
CONTRACT	Is this still relevant – in QLD only and rarely used.	<ul style="list-style-type: none"> <li>Stakeholders see a potential for this objection code to be expanded to the Metering Coordinator for all regions – if parties are allowed to use a market system to block for commercial reasons, other than just reasons that are related to rules obligations.</li> <li>Possibility that this could be used by MCs to block due to direct MC appointment by large customer.</li> </ul>
NOTRANS	Description needs improvement – rarely used. Is this still required?	<ul style="list-style-type: none"> <li>Stakeholders generally considered that this objection code is still required as it can affect billing. It is used by current retailers to stop other retailers from trying to win customers using a correction CR to a previous CR that was never raised in the first place (error correction)</li> </ul>

CRCODE	In what circumstances would this be used?	<ul style="list-style-type: none"> <li>Stakeholders generally considered that this objection code is still required and it is similar in its usage to NOTRANS, the only difference is that it is used for Embedded Network</li> </ul>
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*Are the objection code periods appropriate?*

- Stakeholders discussed that generally when the business has automated processes then a short objection period would be reasonable however, should a party be heavily reliant on manual processes, shortened objection timeframes would be more challenging to accommodate. It was noted that the codes that currently have a 5 day logging period are there for exception cases and that the rule applies to all CRs of that type.
- Transfer change requests:
  - Some stakeholders indicated that they still require the 5 days objection logging period as transferring a customer involves a lot of communications including calls, emails, and follow up which makes 5 days reasonable.
- Change role change requests:
  - Some stakeholders cautioned that reducing the objection logging period for a 6800 CR could increase the CR 6000 series used to correct errors, and also it can result on the old MPB missing the CR if they needed to object and this might lengthen the process in total.
- Some stakeholders supported a general reduction in objection logging periods.

**Topic 2: B2B Requirements – Life Support**

Stakeholders indicated that they are aware of the output from ERCF discussions regarding Life Support changes as a result of the Metering Competition rule change, the output was:

- Preferred solution:**
  - DNSP to phone Retailers once they become aware of Life Support situation at a customer premises.
  - DNSP to follow up the phone call with an email of a standard template to provide Life support information on the customer premises.
  - Retailer acknowledges the receipt of the life support notification.
- Alternative solution:**
  - DNSP to use the B2B transaction “One Way Notification” to notify Retailer of Life Support notification.
  - Retailer acknowledges the receipt of the life support notification.
- Stakeholders noted the output from ERCF meetings regarding life support, however they questioned whether some assessment needs to be performed to decide if a valid business case exists to use B2B “One Way Notification” for Life Support instead of phone and email.
- AEMO clarified that they will provide the workshop notes related to any B2B topics to the IEC to decide the required B2B changes as AEMO doesn’t govern the B2B procedures.

### **Topic 3: B2B Requirements – Retailer Planned Interruption**

*Are there views relating to the use of?*

- *MSATS notification process*
- *Commercially agreed communications*
- *B2B One-Way Notifications, either:*
  - *As part of the MC / EN procedure changes*
  - *To be considered as part of SMP rule changes.*
- Stakeholders questioned whether MSATS notifications can be used for retailers to notify DNSPs of planned interruption ahead of the event. AEMO clarified that MSATS can be used prospectively for future changes and as such, could meet the requirements of the notification.
- Some stakeholders suggested that the B2B “One Way Notification” transaction which can contain multiple NMIs in one notification, may be more efficient than an MSATS notification.
- The group discussed the problem of using the “One Way Notification” B2B transaction when the MC is undertaking the planned interruption to manage their assets. In this case, the general view was that the Retailer would have to have an agreement with the MC to ensure the Retailer was informed of any such planned interruption and the notification to the DNSP would come from the Retailer in all cases (i.e. the MC would not be required to send any transactions relating to planned interruptions through B2B).
- Stakeholders questioned how useful or valuable currently the use of One Way Notification by DNSPs to notify the retailers of Planned interruptions and whether Retailers save any data that is sent to them. Retailers clarified that they don’t save the data and they only use it as a guide, as the current process is not standardised or mandated.
- DNSPs noted that if the current process used by the DNSP to notify the Retailers of planned interruption is used as a guide only by the retailers, is not standardised, and there is no notification when the planned interruption is cancelled, then it will be the same for Retailers using One Way Notification to notify DNSPs for Planned interruption, which means no real value is added for using the B2B transaction.
- Retailers noted that currently there is no standard way of how they get notified of planned interruptions by DNSPs as DNSPs use different notifications methods which creates a lot of confusion. And if the same happened for retailer planned interruption then more confusion will be created.
- The group noted that if the B2B “One Way Notification” is standardised and mandated from retailers to DNSPs and vice versa for planned interruption notifications then it will be the preferred method of notification.
- Some stakeholders mentioned that currently in NSW, DNSPs notify retailers of outages daily using a spreadsheet, they suggested that using One Way Notification might not be a good solution because it will create lots of unnecessary notifications in the market and that using a spreadsheet or a website to publish outage details might be the best option.

#### *Summary*

The group discussed the following possible options for the Retailer Planned Interruption notification:

- No B2B change, every retailer can use whatever they choose to notify DNSPs of planned interruptions (i.e. phone, email, MSATS notification, spreadsheet, etc.)
- Create standard process in B2B for retailer planned interruption notification.

- Create standard process in B2B and make it mandatory for both parties as in retailer notifying DNSP, and DNSP notifying retailer – mandating that the retailer and DNSP must use this method of communication of all planned outages across the NEM (this option was considered to be the most optimal long term solution by the stakeholders attending the workshop).

#### **Topic 4: ROLR Requirements – Metering Coordinator Appointment**

*Do stakeholders agree that significant risks are created if attempting to change multiple roles through the RoLR process?*

- Stakeholders noted that there is a risk for all non-FRMP assigned Metering Coordinators, if the MC is to change as part of the ROLR process.
- Stakeholders raised the question of how to differentiate between MC appointed by FRMP or by parties other than the FRMP? And how this can happen in a ROLR event?
- The group discussed that it is expected that every retailer in the market will have a relationship with every MC in the market, so if a ROLR event happens and the failed retailer exits the market then the new retailer/ROLR should be able to pick the failed Retailer’s MC to be their MC in the ROLR event and should consider provisions for such an event in their commercial agreements.
- Stakeholders raised the question of what should happen if the Retailer and the MC were the same through the ring fencing arrangements and the retailer failed. The group discussed that through ring fencing the MC and the retailer are two separate businesses and they have different ABNs. And that for failed retailer there is the ROLR arrangements, and for failed MC there are the default arrangements in the rules which will be followed in the Metering Coordinator default event.

*What are stakeholder views on changing the FRMP from failed retailer to designated RoLR only?*

- Stakeholders indicated that ROLR should only be related to and focusing on changing the FRMP from the failed retailer to designated ROLR only, and that ROLR shouldn’t really care about the meter exchange and the MC/MP/MDP as this can all be sorted out through commercial arrangements.
- Stakeholders discussed that ROLR is for retailers to manage any financial risks to the market, However MC/MP/MDP meters can be read anytime and has nothing to do with ROLR.
- AEMO noted that the bulk change tool could be utilised to bulk change MC roles, should the retailer wish to make such a change, following a ROLR event.

*Stakeholder views on how the RoLR process should deal with the appointment of roles other than the FRMP?*

- The group raised an issue related to MC compensation as a result of ROLR event and whether this needs to be added to the procedures. The issue raised is if a new retailer/designated ROLR is assigned as a result of a ROLR event and the old MC of the failed retailer has lost their contract with the failed retailer and they need to work in ROLR with the new retailer for that point in time, then the MC might be at financial risk and that the procedures need to provide compensation or some sort of security to the MC in the case of ROLR event. AEMO noted that this doesn’t seem to be a ROLR issue and that this is a normal transfer issue where the retailer has the responsibility for the appointment of the MC.

### Summary

- The general view expressed from stakeholders was that there is a risk if trying to change multiple roles other than the FRMP during the ROLR event, and that it is reasonable for only the FRMP to change from the failed retailer to the new designated ROLR in a ROLR event.

### **Topic 5: Network Tariff Code Updates**

#### *Is there a need for change?*

- Stakeholders indicated that there is a need for change as currently when an MP puts a CR3000 series change request in MSATS and they don't specify the network tariff code. As a result the original value of that field gets lost and overwritten and the DNSP needs to go through another process to input those values again which is time consuming and unnecessary extra work. Anecdotally this can occur on around 80% of all changes.

#### *If so, are there any issues with the FRMP/MC instructing the MP to change the network tariff code (in accordance with DNSP tariff requirements).*

- The group indicated that the MP should be able to provide the network tariff code value in MSATS based on instructions from the FRMP and the MC.
- Stakeholders discussed that as per the rules the obligation is still on the DNSP to provide the Network Tariff Code, and that MSATS still needs to enable DNSPs to provide and update the network tariff code, or object to the value of the field if other party like an MP has input the wrong value, as the network tariff value in MSATS can be very important to the DNSP (noting that not all DNSPs use the MSATS code to determine network billing).

### Summary

- The following options were discussed for updating the Network Tariff Code value in MSATS:
  - Make no change to the current functionality – i.e. MP updates if they want to, if they leave it blank the DNSP must reinstate the value into the field.
  - Make no change to what the MP can do in MSATS in terms of updating the Network Tariff Code value, but change MSATS so that if the MP doesn't populate the Network Tariff code field in MSATS through CR3000 series then MSATS doesn't overwrite the original value of that field. DNSP would still have rights to overwrite.
  - Make it mandatory for the MP to input a value in the Network Tariff Code field based on instructions from FRMP, MP, or MC and not allow the field to be blank. And then the DNSP can validate the value provided by the MP and alter if required. MP/MDP representatives requested that if this option was to be implemented then the C4 report should be available to MPs and MDPs.