

# MINOR AMENDMENT CONSULTATION – PARTICIPANT RESPONSE PACK

## MSATS PROCEDURES:

Consumer Administration and Transfer Solution  
(CATS) Procedure Principles and Obligations Version  
4.7

Procedure for the Management of Wholesale,  
Interconnector, Generator and Sample (WIGS) NMI's  
Version 4.7

Participant: Red Energy and Lumo Energy  
Submission Date: 4 January 2019

# Table of Contents

<b>1. PROPOSED CHANGES</b> .....	<b>3</b>
A. PROPOSED CHANGES TO THE CATS PROCEDURE.....	3
B. PROPOSED CHANGES TO THE WIGS PROCEDURE.....	6

## 1. Proposed Changes

This section lists the changes proposed by participants or by AEMO since the last completed consultation *MSATS Procedures*:

- *Section 4.1 covers the proposed changes to the CATS Procedure Version 4.6*
- *Section 4.2 covers the proposed changes to the WIGS Procedure Version 4.6*

**NOTE:** All proposed additions to the MSATS Procedures are highlighted in red colour text and are underlined. All proposed deletions from the MSATS Procedures are highlighted in red strike through text. Example: ~~Reference~~.

### a. Proposed Changes to the CATS Procedure

Item	ICF or Change ID	Description	Participant Comments
1		<b>PROPOSED / REQUESTED CHANGES</b>	
1.5	ICF_002	<p>The following proposed solution refers to the listed scope item ICF_002 - Post PoC Updates to MSATS Procedures – Objections raised by Tango Energy identified above:</p> <p>Section 36. CR6700/6701 - CHANGE MPB OR MPC OR BOTH – SMALL OR LARGE</p> <p><b>36.7 Objection Rules</b></p> <p>The 'Yes' Roles specified in Table 36-B may Object using the Objection Codes indicated against their Roles within the Objection Logging Period specified in Table 36-A.</p>	<p>Red Energy and Lumo Energy (Red and Lumo) support the proposed changes to the MSATS Procedures and agree with AEMO's assessment of the matters for consultation, we do not foresee this to have consequential impacts to market participants. We agree that this further supports the objective of the initial change supported by the Electricity Retail Market Consultative Forum (ERCF) that was overlooked in the initial consultation.</p> <p>We are concerned with AEMO's approach to meeting its obligations under rule 7.16.7 relating to the notices required under rule 7.16.7(e)(2) advising that the procedure has been published for consultation.</p> <p>We are concerned that AEMO has changed its approach regarding the method to which consultations are managed which is inconsistent with AEMO's document for MSATS Procedure changes – as per the ERCF Change Process</p>

**Table 36-A – Objection Rules\*\***

CR 6700 – Change MP

CR 6701 – Change MP – Retrospective

Objec tion Code	N MI Cla ss	Jur 'n	FRMP		LR		MDP		MPB		RoLR		RP		LNSP	
			N	C	N	C	N	C	N	C	N	C	N	C	N	C
DECLI NED	ALL	AL L	-	-	-	-	-	-	Y es	-	-	-	-	-	-	-
NOTA PRD	ALL	AL L	-	-	-	-	-	-	-	-	-	-	-	-	-	Y es
DATE BAD	ALL	AL L	-	-	-	-	Y es	Y es	-	-	-	-	-	-	-	-

\*\* N = New Role, C = Current Role.

**36.8 Change Request Status Notification Rules**

The Change Request Status Notification Rules are specified in Table 36-C.

**Table 36-B – Change Request Status Notification Rules\*\***

CR 6700 – Change MP

CR 6701 – Change MP – Retrospective

PARTICIPANT ROLE – Receives Notification of Change

Status Change	FRMP		LR		LNSP		MDP		MPB		RoLR		RP	
	N	C	N	C	N	C	N	C	N	C	N	C	N	C
CANCELL ED	-	-	-	-	-	Ye s	-	-	Ye s	Ye s	-	-	-	Ye s
COMPLE TED	-	Ye s	-	-	-	Ye s	-	Ye s	Ye s	Ye s	-	-	-	Ye s

([https://www.aemo.com.au/-/media/Files/Stakeholder\\_Consultation/Working\\_Groups/Retail\\_Meetings/ERCF/2018/ERCF-Change-Process.pdf](https://www.aemo.com.au/-/media/Files/Stakeholder_Consultation/Working_Groups/Retail_Meetings/ERCF/2018/ERCF-Change-Process.pdf)).

Specifically, we note that:

- the proposal (or ICF) was not consulted on with ERCF members as defined under AEMO’s change process.
- no communication was sent from AEMO to NEM stakeholders or forum members advising of upcoming consultation, or providing communications that AEMO has published notice of consultation on their website.

We are concerned that consultation process does not meet AEMO’s change process for MSATS Procedures, and is questionable whether it meets the NER’s rules consultation process.

Red and Lumo support a collaborative and transparent approach to market change. We believe effective industry engagement is imperative in gaining a comprehensive understanding of the potential impacts of decisions, removing this is detrimental to good industry outcomes and ultimately consumers.

Item	ICF or Change ID	Description	Participant Comments																																																												
		<table border="1"> <tr> <td>OBJECTE D</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>Ye s</td> <td>-</td> <td>-</td> <td>Ye s</td> <td>Ye s</td> <td>-</td> <td>-</td> <td>-</td> <td>Ye s</td> </tr> <tr> <td>PENDING</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>Ye s</td> <td>Ye s</td> <td>-</td> <td>-</td> <td>-</td> <td>Ye s</td> </tr> <tr> <td>REJECTE D</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>Ye s</td> <td>-</td> <td>-</td> <td>Ye s</td> <td>Ye s</td> <td>-</td> <td>-</td> <td>-</td> <td>Ye s</td> </tr> <tr> <td>REQUEST ED</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>Ye s</td> <td>Ye s</td> <td>Ye s</td> <td>Ye s</td> <td>Ye s</td> <td>-</td> <td>-</td> <td>-</td> <td>Ye s</td> </tr> </table> <p>** N = New Role, C = Current Role.</p>	OBJECTE D	-	-	-	-	-	Ye s	-	-	Ye s	Ye s	-	-	-	Ye s	PENDING	-	-	-	-	-	-	-	-	Ye s	Ye s	-	-	-	Ye s	REJECTE D	-	-	-	-	-	Ye s	-	-	Ye s	Ye s	-	-	-	Ye s	REQUEST ED	-	-	-	-	-	Ye s	Ye s	Ye s	Ye s	Ye s	-	-	-	Ye s	
OBJECTE D	-	-	-	-	-	Ye s	-	-	Ye s	Ye s	-	-	-	Ye s																																																	
PENDING	-	-	-	-	-	-	-	-	Ye s	Ye s	-	-	-	Ye s																																																	
REJECTE D	-	-	-	-	-	Ye s	-	-	Ye s	Ye s	-	-	-	Ye s																																																	
REQUEST ED	-	-	-	-	-	Ye s	Ye s	Ye s	Ye s	Ye s	-	-	-	Ye s																																																	

**b. Proposed Changes to the WIGS Procedure**

<b>Item</b>	<b>QC ID</b>	<b>Description</b>	<b>Participant Comments</b>
<b>1</b>		<b>MINOR CHANGES</b>	
1.1	N/A	<b>Align version numbering with MSATS CATS procedures.</b> The proposed version of the WIGS Procedures is v4.7.	Red and Lumo support the minor amendments made.