

NEM CUSTOMER SWITCHING

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the ‘NEM Customer Switching’ Draft Procedures.

The changes being proposed seek to enable the implementation of efficient delivery of proposed changes to the customer switching process design in the National Electricity Market (NEM).

2. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
	Version Release History 4.9	Typo: December
2.1(e)(ii)	Objection code evidence timeframe	PLUS ES proposes that 1 bus day timeframe can be very tight and suggests a timeframe of up to 2 bus days.
2.2 (a)		<ul style="list-style-type: none"> The objective of this clause is not quite clear, especially as it is against the new FRMP. One could say that the obligation applies both to the new or current FRMP. PLUS ES proposes a clarification of the clause. Typo with the word ‘Coordinator’
4.13	Table 4-M – Special Read	<p>PLUS ES proposes the following:</p> <ul style="list-style-type: none"> add the following text to the description of SP, The MDP/MPC is to arrange for the Special Meter Reading upon receipt of a ServiceOrderRequest and remove clause 4.13 (b) or

		<ul style="list-style-type: none"> remove the following sentence from the SP Description: The MDP/MPC is to arrange for the Special Meter Reading.
4.14	Previous Read Dates and Quality Flags	<ol style="list-style-type: none"> <i>The Previous Read Date and Previous Read Quality Flag are values provided that specify the date of the previous metering reads and metering data quality flags that were provided to the market.</i> <i>PLUS ES proposes rewording:</i> <ul style="list-style-type: none"> Remove 1st 'provided' or reword to : The Previous Read Date and Previous Read Quality Flag are values provided to the market that specify the date of the previous metering reads and metering data quality flags. AEMO in their response to Table 3 Item 36 have stated: <ol style="list-style-type: none"> <i>AEMO notes where a CRC does not align to a previous read date, for PR read types AEMO will validate a read exists for that date (regardless of quality) and reject.</i> PLUS ES seeks clarification whether AEMO will be validating against the PR code when used for remotely read meters. i.e. CR1000 or CR1040? Clause 4.14 (b) states : The Previous Read Dates and Quality Flags will only be provided where the Metering Data Type is Manually Read. Is 'provided' referring to the NMI discovery? Perhaps a clarification should be made.
6	CR10xx	<p>Having removed most objections from the MDP PLUS ES seeks clarification if AEMO will be validating that the parameters provided meet the criteria, such as, the correct CR and CR code for meter types are used. i.e CR1000 is rejected if a retrospective transfer is required for a manually read meter, a 4a meter with a read type code EI etc .</p> <p>If not, PLUS ES suggests that some objections are re-instated for the current MDP.</p>

6.1.3 (a)	Repeated word	Delete repeated word 'must'.
6.1.4 (b)(i)		Delete CR1010 and CR1040 from this clause. Table 4-N does not support the use of SP read type code for these CRs.
6.1.8	Change Retailer – Retrospective – Long Term/Error (not SMALL)	<p>PLUS ES understands from AEMO that notifications to RP, MPB and LNSP have been removed to mitigate 'save' activities.</p> <p>PLUS ES seeks clarification why the notifications have been removed from the current LNSP and current RP in the CR1020 when the Current FRMP is receiving all the notifications.</p> <p>PLUS ES suggests these notifications are allowed if the current FRMP is to receive them.</p>
6.2.1	Formatting of the table	<p>PLUS ES assumes formatting error; suggest deleting the below rows:</p> <ul style="list-style-type: none"> • Top row empty • 3rd row empty excluding a bulletpoint.
6.2.4	FRMP requirements (g)	<p><i>or leave this action to the New MC to complete.</i></p> <p>PLUS ES suggests that this sentence is not required and should be removed.</p> <p>Section 6.2 is about small NMIs – MCs for Small NMIs cannot correct MC nominations. Allowing this sentence almost implies that the FRMP:</p> <ul style="list-style-type: none"> • does not have to meet their obligation as per clause 2.2(a) and • they can leave it up to the MC to notify them of the incorrect nomination via an off line tool for the FRMP to then raise a CR63xx.

3. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
		n/a

4. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
	General	PLUS ES seeks clarification of the effective date of this document - 20 May 2020 vs the remaining Switching documents 2 December 2020?
Appendix E	Additional Reason Code 67	

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
5. Glossary	Actual Meter Reading	
5. Glossary	Current [Participant/Role]	
5. Glossary	Initial MC	

5. Glossary	Manually Read	Definition missing from glossary.
5. Glossary	Meter Data Type	Metering Data Type; This has been added twice in the Glossary. Once after MAMP and the next after Metering Data Notification Process.
5. Glossary	New [Participant/Role]	
5. Glossary	Previous Read Date	
5. Glossary	Previous Read Quality Flag	
5. Glossary	Read Type Code	
5. Glossary	Remotely Read	

6. General

Section	Description	Participant Comments
	Inflight CR at go live	PLUS ES recommends that maintaining two sets of logic to support the transition should be avoided if possible.
	AEMO validation of CRs	With the removal of the objections for CR10XX there is some ambiguity of what validations will be performed by AEMO. It will be beneficial to have some supporting

		document so that participants will understand how their processes may be impacted and amend accordingly.
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