

NEM CUSTOMER SWITCHING

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Tango Energy

Submission Date: 28 January 2020

Table of Contents

- 1. Context 3
- 2. MSATS Procedures: CATS Procedure Principles and Obligations..... 3
- 3. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs 11
- 4. Meter Data File Format Specification NEM12 & NEM13 11
- 5. Retail Electricity Market Glossary and Framework 12
- 5. Glossary 12

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
2.2 (a)	Ensure that the Metering Coordinatiior (MC) in MSATS reflects the appointment of the MC at the <i>connection point</i> in accordance with the NER.	<p>Reference is made to the NER throughout the Procedures, sometimes with the relevant NER clause details, other times not. For consistency and ease of reference can the relevant NER clause be provided whenever reference is made to the NER.</p> <p>The above should also apply where Procedures and other documents are referenced; include the clause number.</p>
2.3 (c)	<p>The New FRMP must raise a customer transfer no later than one <i>business day</i> following either:</p> <p>(i) for a prospective customer transfer, the day of obtaining explicit informed consent to commence the customer</p>	<p>As this is already under 'The New FRMP must', suggest the following rewording:</p> <p>(d) Initiate a Change Request for the transfer of a <i>NMI</i> in accordance with the applicable Timeframe Rules ensuring a customer transfer is raised no later than one business day following either:</p> <p>(i) for a prospective customer transfer, the day of obtaining explicit informed consent to commence the customer transfer; or</p> <p>(ii) for a retrospective customer transfer, the end of the relevant cooling-off period.</p>

Section	Description	Participant Comments
	transfer; or (ii) for a retrospective customer transfer, the end of the relevant cooling-off period.	The subsequent clauses will need to be renumbered.
2.2 (p)	Establish or update the Customer Classification Code within five <i>business days</i> of the NMI Status Code becoming 'A' in MSATS, where the Customer Classification Code has changed.	Suggest the following rewording as clause (q) provides the obligation and circumstances under which the Customer Classification Code must be updated/provided: Establish the Customer Classification Code within five <i>business days</i> of the NMI Status Code becoming 'A' in MSATS.
2.2 (q)	Update or provide the Customer Classification Code as the following:	Suggest the following rewording: Update or provide the Customer Classification Code as per the following:
2.4 (h) and (l)	Provide the Actual Change Date for Transfers...	As the MDP is required to provide the Actual Change Date for other change of role transactions e.g. Change of MDP (6200/6210), Change MPB or MPC or Both (6700/6701) and Change Multiple Roles (6800/6801), should it be change to: Provide the Actual Change Date for Transfers and Change of Roles...
Table 3-A	Codes Update	Change to ' Code Updates.'

Section	Description	Participant Comments
3.3 (a)	<p>A Change Request is: (a)The facility by which a Participant interacts with MSATS in order to effect a change in data to some or all aspects of information regarding an End User <i>connection point</i> prior to a transfer, during a transfer, or after a transfer has Completed, which includes:</p>	<p>Changes to the information regarding an End User connection point can occur independently of a transfer. Is there are reason for referencing the transfer in this clause?</p> <p>Suggest the following rewording:</p> <p>(a) The facility by which a Participant interacts with MSATS in order to effect a change in data to some or all aspects of information regarding an End User <i>connection point</i> which includes:</p>
3.3 (e)	<p>A Change Request is: (e) Within certain Change Reason Codes, data items associated with address information are provided as mandatory and optional. Mandatory address information specified as locality, state and postcode, where 'locality' has the same meaning as 'suburb'. Optional address information is given in either structured or unstructured format. Section 15.3.1 provides additional</p>	<p>(e) does not follow from the opening and either needs to be reworded or in a separate section.</p>

Section	Description	Participant Comments
	information about address data items.	
3.3 (f)	(f) Able to only be assigned one DLF Code.	Suggest the following rewording: To be assigned only one DLF code.
3.4 (a)	The progression of a Change Request is based on the principle that transactions will be approved unless an Objection is received.	Is this saying a transaction will Complete unless an Objection is received? It is understood a Change Request can Complete once all Objections have been withdrawn or will be cancelled if the objection is not withdrawn in the applicable timeframe. Also a Change Request can be rejected at the time of completion if data has subsequently been changed since the CR was submitted making it invalid. Suggest rewording or deleting the clause.
3.4 (c) (vi)	(vi) have available to the Participant the data items as governed by the Change Reason Code.	Suggest the following rewording: (vi) have available the data items as governed by the Change Reason Code.
3.4 (g) (i)	(g) The Objected status: (i) occurs where one or more Objections have been received, in which event notifications of the Objections are sent to the relevant parties, including details of the	Consider removing the text highlighted in red. It is understood multiple objections may be received but each objection will not contain detail of all objections lodged.

Section	Description	Participant Comments
	<p>Objections and whether the transaction was already being Objected to;</p>	
4.2	<p>Change Reason Code (a) A Change Request carries with it a set of CATS Standing Data items. The set of data items will vary with the transaction selected by the Participant initiating the Change Request. Each transaction has a Change Reason Code. The Change Reason Codes govern the population of data in a Change Request.</p>	<p>Suggest the following rewording: A Change Request contains CATS Standing Data items. The data items will vary depending on the Change Request initiated by the Participant. Each Change Request has a Change Reason Code. The Change Reason Codes govern the population of data in a Change Request.</p>
Table 4A	<p>1061 Debt New (SMAL FRMP L NMI only)</p>	<p>In section 7.1.3 it states: (b) For a CR1061 by the most recent previous FRMP.</p>
4.7	<p>(a) The Objection Codes defined in Table 4-D are the only basis on which Participants can Object to a Change Request, solely on the condition that Participants are able to produce evidence to AEMO to substantiate the</p>	<p>Suggest the following rewording: The Objection Codes defined in Table 4-D are the only basis on which Participants can Object to a Change Request. Raising of an Objection is conditional on Participant’s ability to produce evidence to AEMO to substantiate the raising of an Objection Code as fair and reasonable, within one business day of a request by AEMO to produce such evidence.</p>

Section	Description	Participant Comments
	<p>raising of an Objection Code as fair and reasonable, within one business day of a request by AEMO to produce such evidence.</p>	
Table 4D	DATEBAD and Table 6-F	<p>The FRMP is removed from the definition indicating that for Error Correction transfer 1023 the FRMP will not be able to object to the transfer if the New FRMP uses a proposed change date that is not the same date as that on which the NMI transferred to the current FRMP. However, in Table 6-F the current FRMP can object – DATEBAD.</p>
Table 4D	DECLINED	<p>The New FRMP may nominate the RP (MC) in the 10X0 yet there is no ability or timeframe in which the RP may object if they have been nominated in error. Please explain how this will be corrected and include in the Procedures.</p>
4.10.1	Customer Classification Code	<p>Suggest the following rewording:</p> <p>The FRMP must provide an End Users Customer Classification Code within five business days of becoming aware the value in MSATS is not populated. Refer Table 4-F.</p> <p>The FRMP must update an End Users Customer Classification Code within five business days of becoming aware the value in MSATS is incorrect. Refer Table 4-F.</p>
4.13	Read Type Code	<p>Suggest the following rewording:</p> <ul style="list-style-type: none"> (a) The Read Type Code indicates to the MDP either a specified Meter Reading is to be used, or no Meter Reading is required to affect the transfer. (c) The Read Type Code relates to the Proposed Change Date.

Section	Description	Participant Comments
		Is the example in (C) necessary?
Table 4-M	Previous Read Date	Suggest the following rewording: Advice from the New FRMP to the MDP that the transfer is to occur on a previous Meter Reading, taken within the previous 15 business days.
Table 4-M	Read Required	Suggest the following rewording: Advice from the New FRMP to the MDP that: (1) The Proposed Change date, that will become the Actual Change Date, is to be the date an Actual Meter Reading or substituted metering data, as appropriate, was obtained.
Table 4-M	Special Read	Suggest the following rewording: Advice from the New FRMP to the Current MDP a B2B Service Order is provided to arrange for a physical site visit to undertake a reading to facilitate an End User transfer. The MDP/MPC is to arrange for the Special Meter Reading. Applies to type 4A, 5 and type 6 <i>metering installations</i> .
4.14	Previous Read Dates and Quality Flags	Suggest the following rewording: (a) Previous Read Date and Quality Flag The Previous Read Date and the Previous Read Quality Flag are values provided to the market specifying the date of the previous meter reading and the associated metering data quality for that read. (b) The Previous Read Date and Quality Flag will only be provided where the <i>Metering Data Type</i> is Manually Read.
6.1.1	Application [1000 1010 1020 1030 1040]	Section 76.1 applies when one of the following Change Reason Codes applies: Similar wording to that above is included in all sections. Is there a reason for this? If not suggest removing it.
6.1.3	FRMP Requirements	Please reinstate the separate clauses for 'Must 'and May' to add clarity to the New FRMP's obligations.

Section	Description	Participant Comments
		Should (e) read: Must withdraw the transfer request where the NMI Classification Code is SMALL, if advised by the Current MDP a Meter Reading cannot be obtained in response to a Read Type Code of SP;
6.1.5	MC Requirements	Suggest the following rewording: The MC must ensure MDP, MPC and MPB roles are correct and if not raise the appropriate Change Request to update them. Refer to sections 12.1 to 12.8 for Change Requests relating to Role Changes.
Table 6-A	Timeframe Rules	CR1010-Change Retailer-Retrospective has been reinstated with a Retrospective period of 65 business days. Previously it was 10 business days. Is the increase in days correct? If so, how is this justified?
Table 7-B	Objection Rules	The Objection rules for CR 1010 have been deleted. Is this correct as the CR1010 has been reinstated?
6.2.1	Application [1023 1025 1029]	Suggest removing the following as it is clear in 6.1 the 1020 is used for Large NMIs: Please note that the appropriate Change Request for a LARGE NMI is CR 1020 – Change Retailer – Retrospective – Long Term/Error (not SMALL9). More information about this Change Request is provided in Section 6.1.
6.2.1	1029 – Other Error Corrections (SMALL only)	Suggest the following rewording: These must be reasons other than those covered by CR1023 and CR1025.
6.2.4 (g)	Populate the Change Request with the identity of the following Roles: RP or leave this action to the New MC to complete.	Should the 'or' statement also be included in 6.1.3 FRMP Requirements?
7.1.5	Timeframe Rules	Suggest the following rewording: When preparing a Change Request the initiating FRMP must ensure the date of Completion for the previously Completed Change Request is not greater than the period shown in Table

Section	Description	Participant Comments
		7-A.
7.2.1	Application [1500]	Should the below read New/Current FRMP? The MDP is required to provide MSATS with the Actual Change Date following the initiation of a Change Request by a FRMP or MC requiring an Actual Change Date.
Table 15-C	NMI Standing Data Items and NMI Discovery Access Rules	The Standing Data Access Rights are not populated for Previous Read Quality Flag.

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

Section	Description	Participant Comments
		No Comments

4. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
Appendix E	Additional Reason Code 67	No Comment

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
5. Glossary	Actual Meter Reading	Suggest the following rewording: For Manually Read meters, the accumulated data collected from the meter. For Remotely Read meters the interval metering data collected from the meter.
5. Glossary	Current [Participant/Role]	No comment
5. Glossary	Business Document	According to the B2B Procedure there are six types of One Way notification: MeterExchangeNotification NetworkTariffNotification PlannedInterruptionNotification MeterFaultAndIssueNotification NoticeOfMeteringWorks NotifiedParty Suggest list all of these and removing OneWayNotifocation from the list.
5. Glossary	Initial MC	No comment
5. Glossary	Manually Read	The definition for Meter Data Type appears twice. There is no definition of Manually Read.

Section	Description	Participant Comments
5. Glossary	Meter Data Type	No Comment
5. Glossary	New [Participant/Role]	No comment
5. Glossary	Previous Read Date	No comment
5. Glossary	Previous Read Quality Flag	No comment
5. Glossary	Read Type Code	<p>Suggest the following rewording:</p> <p>The type of meter reading to be used to affect an End User transfer as provided to the MDP by the New FRMP. Refer to Table 4-M in the CATS Procedures.</p>
5. Glossary	Remotely Read	No comment