

MSATS Standing Data Review

- MSDR Issues Paper
- MSATS Procedures – WIGS
- MSATS Procedures – CATS
- Standing Data for MSATS Guideline
- Retail Electricity Market Procedures
Glossary & Framework

CONSULTATION – Draft Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:** Endeavour Energy*

***Completion Date:** 5 June 2020*

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1. Context

This template is to assist stakeholders in giving feedback to the questions raised in the Draft Report about the proposed changes to the MSATS Standing Data.

2. Questions raised in the MSATS Standing Data Review Draft Report

2.1 Material Issues

Information Category	Question No.	Question	Participant Comments
Type 4a Metering Installation (MRAM) Reason	1.	What are the key issues for AEMO to consider in working with stakeholders to explore with the AEMC the potential benefits of enhanced access to exception information?	No comments
Metering Installation Transformer Information	2.	In the cases where transformers have dual secondary windings or more (500kV : 110V : 110V), how would participants prefer to see those represented in the enumerated list for VT Ratio, keeping in mind that a transformer can have up to five secondary windings?	No comments
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	A MC, MP or FRMP can request the LNSP to change the shared fuse value via email until a B2B transaction is created, if the volume warrants the creation of such a B2B transaction.

Information Category	Question No.	Question	Participant Comments
GPS Coordinates	4.	Please explain the benefits for expanding the GPS coordinates field to cover all NEMs given this would be a significant cost? For example, some multi-floor buildings would have the same GPS coordinates so you may also need to have elevation for which floor (assuming metering on each unit)?	<p>We believe that collecting and providing GPS coordinates is costly when compared to other alternatives, such as the use of the meter location field, and at times does not provide the desired benefit, such as when the meter is located on a certain floor of the building. We also believe that providing GPS coordinates for sites where the meter location is easily identifiable, such as most residential sites, will provide minimal benefits.</p> <p>However we note that AEMO is progressing with GPS coordinates based on the objective of enabling energy market efficiencies in the long-term interests of consumers. We support this objective and therefore support AEMO's decision, on the basis of AEMO's assessment which is the benefits of providing GPS coordinates enhances the capability of industry to locate and provide metering services, in particular where a meter is located away from main buildings such as a pump in a field.</p>
	5.	AEMO has applied the definition of rural using the 'Designated regional area postcodes' to gain consistency in approach, however feedback indicates a mixed response to this option. Is there an alternate NEM wide definition that can be applied across the NEM? AEMO notes, for example, in	We believe that if GPS coordinates is mandatory for all manually read meters, for all new connections and for all meter exchanges, then there is no need to define rural sites and

Information Category	Question No.	Question	Participant Comments
		Queensland NMs are required to be classified as urban, short rural and long rural for Guaranteed Service Levels. Is there something similar to this in other jurisdictions and can it be applied there?	instead for simplicity, GPS coordinates should be made mandatory for all sites.
	6.	Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.	We note that AEMO is progressing with GPS coordinates based on the objective of enabling energy market is efficiency in the long-term interests of consumers. We support this objective and therefore support AEMO's decision, on the basis of AEMO's assessment which is the benefits of providing GPS coordinates enhances the capability of industry to locate and provide metering services, in particular where a meter is located away from main buildings such as a pump in a field.
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	We generally populate this field with a text description of the network tariff.
	8.	Are there other fields that may be suitable to apply this information? For example, Meter Location field with an increased character length available for the field.	We do not believe that a text description of the network tariff is required given that the network tariff code is the primary information for network tariffs. Also, should someone want the text description of the network tariff then this is available in the network tariff code list within MSATS – see examples below:

Information Category	Question No.	Question	Participant Comments															
			<table border="1"> <thead> <tr> <th colspan="3">Network Tariff Codes</th> </tr> <tr> <th>LNSP</th> <th>Code</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>INTEGP</td> <td></td> <td></td> </tr> <tr> <td>INTEGP</td> <td>ENSL</td> <td>Streetlighting</td> </tr> <tr> <td>INTEGP</td> <td>ENTL</td> <td>NTL Traffic Control Signal Lights</td> </tr> </tbody> </table>	Network Tariff Codes			LNSP	Code	Description	INTEGP			INTEGP	ENSL	Streetlighting	INTEGP	ENTL	NTL Traffic Control Signal Lights
Network Tariff Codes																		
LNSP	Code	Description																
INTEGP																		
INTEGP	ENSL	Streetlighting																
INTEGP	ENTL	NTL Traffic Control Signal Lights																
	9.	Do you agree with retaining the Network Additional Information field?	No, we suggest that the Network Additional Information field be removed. If this field is to be kept then given the name, and therefore the intent, of the field then this field should be the responsibility of the LNSP to populate.															

2.2 Data Transition

Information Category	Question No.	Question	Participant Comments
Scenarios	10.	For Removed fields, would you prefer Option 1 (retain history) or Option 2 (remove history)?	We believe that both options are required. Most data fields being deleted is because there is minimal data populated for these fields or there is non-usable data populated, therefore option 2 would be most suitable for these fields. However for some deleted data fields option 1 may be more suitable, for example the unstructured address fields.

Information Category	Question No.	Question	Participant Comments
Scenario 2: Add a new field (Proposed Fields)	11.	For Added fields, would you prefer Option 1, 2a, 2b, 2c, 3, 4 or 5?	We believe that all options are required - some option is more suitable for certain data field and the market participant. Allowing different options will provide flexibility for market participants to choose the most cost-effective method for them.
	12.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	We believe that both options are required. The most suitable option for each data field will be dependent on further data analysis later in this industry project and each market participant should be given the flexibility to choose the most cost-effective approach for their data field.
	13.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	We believe that both options are required. The most suitable option for each data field will be dependent on further data analysis later in this industry project and each market participant should be given the flexibility to choose the most cost-effective approach for their data field.
	14.	If you choose Option 2c, please choose between for i(a) or i(b).	We believe that both options are required. The most suitable option for each data field will be dependent on further data analysis later in this industry project and each market participant should be given the flexibility to choose the most cost-effective approach for their data field.

Information Category	Question No.	Question	Participant Comments
	15.	Do you have any further comment regarding the above?	<p>Together was an industry we should consider the transition approach after the final determination to ensure that data is populated as soon as possible and in a manner to minimise impacts to other market participants.</p> <p>Given that systems and processes are reliant on data, the industry testing phase should be longer than a normal to allow for participants to populate the test environment with the appropriate data and allow for market participants to test their end to end process with the new data.</p>
Scenario 3: Amend an existing field (To Amend)	16.	For Amended fields, would you prefer Option 1, 2a, 2b, 3, 4 or 5?	We believe that all options are required - some option is more suitable for certain data field and the market participant. Allowing different options will provide flexibility for market participants to choose the most cost-effective method for them.
	17.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	We believe that both options are required. The most suitable option for each data field will be dependent on further data analysis later in this industry project and each market participant should be given the flexibility to choose the most cost-effective approach for their data field.

Information Category	Question No.	Question	Participant Comments
	18.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	We believe that both options are required. The most suitable option for each data field will be dependent on further data analysis later in this industry project and each market participant should be given the flexibility to choose the most cost-effective approach for their data field.
	19.	Please provide any further details required	We support a solution that allows for changes to be made with a very short notice period. If removing the enumerations from the aseXML and validating the enumerations when processing a Change Request enables quick alterations of the enumerations, then we would support this approach.
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	We believe that all options are required with each option more suitable for certain market participants. Allowing different options will provide flexibility for market participants to choose the notification method they prefer, which may be dependent on their system capability and how soon they want to receive the data given that each market participant will value each data field differently.
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	We suggest that an alternative to option 1a is for MSATS to be updated to allow each market participant to configure if they only want one notification for a group of participant ids that a

Information Category	Question No.	Question	Participant Comments
			<p>market participant owns. For example, Networks are usually the LNSP, RP, MPB, MPC and MDP for type 5, 6, 7 and in future NCONUML NMIs and most Networks have a common system to process the notifications for these roles. Therefore only one notification is required - subsequent notifications under the other roles are redundant and therefore provides no value. If this alternative option is to be adopted then it should always be available, as opposed to being only available for the purpose of this project.</p>

2.3 Other Matters

Information Category	Question No.	Question	Participant Comments
Consumer Data Right	22.	Do you agree with the proposed new fields?	No comments
	23.	What types of scenarios – including specific examples – could be envisaged which would raise complexities whose resolution would be required in order to achieve the data sharing objectives?	No comments
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	No comments
	25.	Do you agree with the timeframe for updating the data in these fields?	No comments
	26.	Are there other suggestions to help meet the ACCC's objective?	No comments
	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	We have experienced numerous issues where the metering provider did not populate the network tariff codes as per our policy – this includes applying network tariff codes that are not applicable for the customer, changing the network tariff code retrospectively, applying a controlled load network tariff code for registers that are not for a controlled load or for the wrong controlled load regime, and applying a mixture of different network tariff codes that are not allowed.

Information Category	Question No.	Question	Participant Comments
			<p>This caused manual work to determine the root cause and rectify the issue, it also delayed the billing of these NMIs which impacted on cash flow and required us to consult with impacted retailers to explain the problem and the required resolution when matters got escalated. This manual work has increased by 20% since 1 December 2017 and is expected to continue increasing given that interval meters is only installed at 20% of sites within Endeavour Energy's network area.</p>
	28.	<p>If AEMO was to review the obligations on NTC, out of the options proposed, which do you see being the most effective to address the current issues experienced. Please provide reasons as to why you think the options you've chosen would address the issue.</p> <ul style="list-style-type: none"> a) Compliance options for MPB performance for incorrectly populating NTC b) Retailer obligations to inform the MC and MPB of the appropriate NTC c) Network obligations to correct an incorrectly populated NTC within three business days; and or d) If networks are provided the obligation to populate NTC then they will have only three business days to correctly 	<p>Option 1 continues with the data structure where network billing information is combined with metering information in one record. This option provides a small improvement over the current approach by assigning the network tariff code responsibility solely to the Network. However, only the metering provider can create and change the metering record and therefore still creates a dependency and maintenance obligation on the Network when the metering record is updated.</p> <p>On the other hand, option 2 changes the data structure so that network billing information is no longer combined with metering information</p>

Information Category	Question No.	Question	Participant Comments
		<p>populate this after the metering installation details are provided by the MPB, this will ensure there are not additional delays to the commissioning of the meter in MSATS</p>	<p>and can be linked if required (for example, if the premises only has one network tariff assigned to it then linkage is not required because the network tariff would apply to the metering data for all the meter registers).</p> <p>With the current and future market only allowing metering providers to install interval meters, having MSATS structured to separate network billing information from metering information will support market structures and roles whereby network services and metering services are now provided by two separate organisations.</p> <p>We believe that option 2 is the most effective option, noting the explanation we have provided below on how this option can be used for multiple tariffs. This option would address all the issues AEMO is enquiring about because there would be no dependency on the metering provider in order to populate the network tariff.</p>
	29.	Do you have any comments on the options provided by Endeavour Energy?	<p>We believe that option 2 could support separate network tariffs for each meter register if multiple records for the 'Network Service' and 'Network Tariff Code' is allowed (from a data structure point of view this can be achieved if these fields are designed in a similar manner as the NMI Participant Relations information).</p>

Information Category	Question No.	Question	Participant Comments																					
			<p>For example, if a premises had general supply and off peak services then the Network can setup MSATS as follow:</p> <table border="1" data-bbox="1442 459 1944 639"> <thead> <tr> <th>NMI</th> <th>Network Service</th> <th>Network Tariff Code</th> </tr> </thead> <tbody> <tr> <td>4319876543</td> <td>ALLDAY</td> <td>NTC02</td> </tr> <tr> <td>4319876543</td> <td>CONTROLLED</td> <td>NTC06</td> </tr> </tbody> </table> <p>While the metering provider can setup the meter as they normally do as follow:</p> <table border="1" data-bbox="1442 807 2056 954"> <thead> <tr> <th>NMI</th> <th>Meter</th> <th>Register</th> <th>Time of Day</th> </tr> </thead> <tbody> <tr> <td>4319876543</td> <td>Meter123</td> <td>E1</td> <td>ALLDAY</td> </tr> <tr> <td>4319876543</td> <td>Meter456</td> <td>E4</td> <td>CONTROLLED</td> </tr> </tbody> </table> <p>The network tariff can then be mapped via the 'Network Service' and 'Time of Day' fields. In the above example we can see that metering data for E1 would have the network tariff code NTC02 applied to it while metering data for E4 would have the network tariff code NTC06 applied to it.</p>	NMI	Network Service	Network Tariff Code	4319876543	ALLDAY	NTC02	4319876543	CONTROLLED	NTC06	NMI	Meter	Register	Time of Day	4319876543	Meter123	E1	ALLDAY	4319876543	Meter456	E4	CONTROLLED
NMI	Network Service	Network Tariff Code																						
4319876543	ALLDAY	NTC02																						
4319876543	CONTROLLED	NTC06																						
NMI	Meter	Register	Time of Day																					
4319876543	Meter123	E1	ALLDAY																					
4319876543	Meter456	E4	CONTROLLED																					

3. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments
4.1.4.c	<p>The information required for the Connection Configuration field would be unknown at the time when a NMI is created therefore this field cannot be 'mandatory'.</p> <p>Therefore, we suggest that Connection Configuration be removed from the table in clause 4.1.4.c, 4.2.4.c, 4.3.4.c, 7.1.4.c, 7.1.5.b, 7.2.3.d and 7.3.4.d</p> <p>Also, all the information required for the Connection Configuration field is not known to the Network – for example, when a new a new metering installation is installed at an existing connection point for a granny flat and when a new metering installation is installed at an existing connection point for commercial premises that has refurbished/re-configured the premises. However, the Connection Configuration information would always be known to the MP because they are responsible for the metering installation. We believe that the obligation for populating this information should be with the party that has the information, therefore we suggest a new CR Code be created to allow a MP to maintain the Connection Configuration.</p>
4.2.4.c	
4.3.4.c	
7.1.4.c	
7.1.5.b	
7.2.3.d	
7.3.4.d	

4. Proposed Changes in MSATS Procedures - CATS

Section No/Field Name	Participant Comments
2.9	For completeness, this section should be updated to reflect AEMO's obligations to populate the Meter Malfunction Exemption Number, Meter Malfunction Exemption Expiry Date and the GNAF PID fields.
9.1.4.c 9.2.4.c 9.3.4.c 9.4.4.c 12.2.4.c 12.2.5.b 12.5.4.d	<p>The information required for the Connection Configuration field would be unknown at the time when a NMI is created therefore this field cannot be 'mandatory'.</p> <p>We suggest that Connection Configuration be removed from the table in clause 9.1.4.c, 9.2.4.c, 9.3.4.c, 9.4.4.c, 12.2.4.c, 12.2.5.b and 12.5.4.d</p> <p>Also, all the information required for the Connection Configuration field is not known to the Network – for example, when a new a new metering installation is installed at an existing connection point for a granny flat and when a new metering installation is installed at an existing connection point for commercial premises that has refurbished/re-configured the premises. However, the Connection Configuration information would always be known to the MP because they are responsible for the metering installation. We believe that the obligation for populating this information should be with the party that has the information, therefore we suggest a new CR Code be created to allow a MP to maintain the Connection Configuration.</p>

5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments
Name of document	<p>For clarity, the name of the document shown on the first page should have the word 'guideline'.</p> <p>We suggest the document name be labelled as 'STANDING DATA FOR MSATS GUIDELINE'</p>
Table 3, GPSCoordinatesLat and GPSCoordinatesLong fields	<p>The description for the GPSCoordinatesLat and GPSCoordinatesLong fields do not reflect AEMO's decision in the draft determination which states the following:</p> <div data-bbox="770 730 1926 1066" style="border: 1px solid black; padding: 10px;"> <p>4.6.3 AEMO's conclusion</p> <p>AEMO propose to add the new GPS Coordinates field as follows:</p> <ul style="list-style-type: none"> • "Required" for Rural sites for a period of 12 months after which the field becomes "Mandatory"; • "Required" for manually read meters for a period of 12 months after which the field becomes "Mandatory"; • "Mandatory" for all new connections; and • "Mandatory" for all meter exchanges and meter churns. </div> <p>We suggest that the description be updated as per the draft determination, noting that our response to question 5 suggest that given GPS coordinates is mandatory for all manually read meters, for all new connections and for all meter exchanges, then there is no need to define rural sites and instead for simplicity, GPS coordinates should be made mandatory for all sites.</p>

Section No/Field Name	Participant Comments				
Table 3, ReadTypeCode field	The information in this field should be known for each meter. Therefore, we suggest this field be made mandatory. If this suggestion is accepted then the CATS and WIGS Procedure should also be updated.				
Table 3, Use field	The information in this field should be known for each meter. Therefore, we suggest this field be made mandatory. If this suggestion is accepted then the CATS and WIGS Procedure should also be updated.				
Table 3, NextScheduledReadDate field	<p>Currently the NSRD is expected for a manually read meter and it is not expected for a type 7 NMI. The draft determination proposes that a NSRD for a type 7 is mandatory. There is little value in having a NSRD for a type 7 NMI given that the metering data is calculated monthly, therefore we suggest that a NSRD is not required for a type 7 NMI.</p> <table border="1" data-bbox="768 754 1924 895"> <tr> <td data-bbox="768 754 1021 895">NextScheduledReadDate</td> <td data-bbox="1021 754 1585 895">Indicates the Scheduled Next Read Date for the <i>meter</i> if a manual Meter Reading is required.</td> <td data-bbox="1585 754 1787 895">MANDATORY for manually read meters and Type 7 metering installations and NOT USED for remotely read meters</td> <td data-bbox="1787 754 1924 895">MPB initially, then MDP for updates</td> </tr> </table>	NextScheduledReadDate	Indicates the Scheduled Next Read Date for the <i>meter</i> if a manual Meter Reading is required.	MANDATORY for manually read meters and Type 7 metering installations and NOT USED for remotely read meters	MPB initially, then MDP for updates
NextScheduledReadDate	Indicates the Scheduled Next Read Date for the <i>meter</i> if a manual Meter Reading is required.	MANDATORY for manually read meters and Type 7 metering installations and NOT USED for remotely read meters	MPB initially, then MDP for updates		
Table 6, SharedIsolationPointFlag field	<p>The purpose of the Shared Isolation Point Flag is to help reduce wasted site visit for a meter change when it is known that a premises has a shared isolation point. To reduce maintenance costs this field should not be required for NMIs where there is no meter or would require a site visit anyways due to the complexity of the metering installation.</p> <p>We suggest the 'Standing Data Required' column be updated to:</p> <p>Not required for type 7, NCONUML, BULK, XBOUNDRY and INTERCON NMIs. Mandatory for all other NMIs.</p>				

Section No/Field Name	Participant Comments
	<p>This should also be reflected in the CATS and WIGS Procedure.</p>
<p>Table 6, ConnectionConfiguration field</p>	<p>The purpose of the Connection Configuration is to help provide key information to assist with meter changes. To reduce maintenance costs this field should not be required for NMIs where there is no meter. In addition, the information required for the Connection Configuration field would be unknown at the time when a NMI is created therefore this field cannot be 'mandatory', instead it should be 'required'.</p> <p>We suggest the 'Standing Data Required' column be updated to:</p> <p>Not required for type 7 and NCONUML NMIs. Required for all other NMIs</p> <p>Also, all the information required for the Connection Configuration field is not known to the LNSP – for example, when a new a new metering installation is installed at an existing connection point for a granny flat and when a new metering installation is installed at an existing connection point for commercial premises that has refurbished/re-configured the premises. However, the Connection Configuration information would always be known to the MPB because they are responsible for the metering installation.</p> <p>Therefore we suggest that the 'Party to Provide' column be updated to the MPB.</p> <p>This should also be reflected in the CATS and WIGS Procedure.</p>
<p>Table 8, ControlledLoad field</p>	<p>We agree with the suggested enumerated values for this field. However we believe that the description of this field should be changed to represent the meter's configuration for load control.</p> <p>For context, controlled load can be managed via a network device or a meter. If a load is controlled by a network device, then it is unreasonable to expect the MP to know the</p>

Section No/Field Name	Participant Comments
	<p>control load setting of the network device – in this scenario the MP should set the ControlledLoad field to 'No' and the TimeofDay field to 'Controlled', and the Network will communicate the network device setting via the network tariff code. If a load is controlled by a meter then only the MP can configure the control load settings within the meter – in this scenario the MP should set the ControlledLoad field to a value that corresponds to the applicable controlled load setting, eg CL1, CL2 or CL3 and the TimeofDay field to 'Controlled', and the Network can validate the network tariff code that the MP populated (assuming the MP is still responsible for the NTC) or allow the Network to determine and populate the network tariff code (assuming the Network becomes responsible for the NTC).</p> <p>Therefore we suggest that the description of this field be changed to:</p> <p>Indicates whether this register is configured to manage a load under the distributor's approved Controlled Load regime. The ControlledLoad field must be "No" if the register does not manage a Controlled Load. If the register manages a Controlled Load then this field must be populated with a Controlled Load Code, as defined in section 11, that corresponds to the distributor's Controlled Load regime the register is configured to.</p>
Table 8, Suffix field	<p>The description states that "The Suffix value must be unique for each meter". it is not sufficient for the suffix value to be unique for each meter, it must be unique for each NMI. For example, if a NMI has two meters, say meter A and meter B, then meter A cannot have the same suffix as meter B, otherwise at the NMI level there will be two active suffixes with the same value.</p> <p>Therefore we suggest updating the description to "The Suffix value must be unique for each meter the NMI"</p>

Section No/Field Name	Participant Comments																														
Table 16, Valid Time of Day Codes	It looks like ALLDAY and INTERVAL are similar except that INTERVAL is clearly for an interval meter only. For simplicity we suggest that INTERVAL be removed and ALLDAY be kept because ALLDAY can be used for all meter types, including unmetered loads.																														
Table 17, Valid Controlled Load Codes	<p>In line with our feedback on the ControlledLoad field, we suggest that the definition of the 'No' Code be changed to 'This register is not configured to manage a load under the distributor's approved Controlled Load regime'.</p> <p>In addition we suggest that the 'No' Code be changed to 'NO', that is all uppercase. This is for consistency with the other codes.</p>																														
Table 49, CATS_Meter_Register	<table border="1" data-bbox="763 683 1921 719"> <tr> <td>ReadTypeCode</td> <td>Meter Read Type</td> <td>MV3</td> <td>RTDA</td> <td>ReadTypeCode</td> </tr> </table> <p>The ReadTypeCode for the basic meter example is missing the fourth character, we suggest the value be MV3M</p>	ReadTypeCode	Meter Read Type	MV3	RTDA	ReadTypeCode																									
ReadTypeCode	Meter Read Type	MV3	RTDA	ReadTypeCode																											
Table 49, CATS_Meter_Register	<table border="1" data-bbox="763 858 1921 1129"> <tr> <td>CurrentTransformerTest</td> <td>Current Transformer Test</td> <td></td> <td>Tested</td> <td>VARCHAR2(20)</td> </tr> <tr> <td>CurrentTransformerSampleFamilyID</td> <td>Current Transformer Sample Family ID</td> <td></td> <td>201000298</td> <td>VARCHAR2(20)</td> </tr> <tr> <td>CurrentTransformerTestDate</td> <td>Current Transformer Test Date</td> <td></td> <td>01-01-2020</td> <td>dd-mm-yyyy</td> </tr> <tr> <td>VoltageTransformerTest</td> <td>Voltage Transformer Test</td> <td></td> <td>Tested</td> <td>VARCHAR2(20)</td> </tr> <tr> <td>VoltageTransformerSampleFamilyID</td> <td>Voltage Transformer Sample Family ID</td> <td></td> <td>201000298</td> <td>VARCHAR2(20)</td> </tr> <tr> <td>VoltageTransformerTestDate</td> <td>Voltage Transformer Test Date</td> <td></td> <td>01-01-2020</td> <td>dd-mm-yyyy</td> </tr> </table> <p>For consistency, the Data Element Name for the above field should reflect the name of the element and not the format</p>	CurrentTransformerTest	Current Transformer Test		Tested	VARCHAR2(20)	CurrentTransformerSampleFamilyID	Current Transformer Sample Family ID		201000298	VARCHAR2(20)	CurrentTransformerTestDate	Current Transformer Test Date		01-01-2020	dd-mm-yyyy	VoltageTransformerTest	Voltage Transformer Test		Tested	VARCHAR2(20)	VoltageTransformerSampleFamilyID	Voltage Transformer Sample Family ID		201000298	VARCHAR2(20)	VoltageTransformerTestDate	Voltage Transformer Test Date		01-01-2020	dd-mm-yyyy
CurrentTransformerTest	Current Transformer Test		Tested	VARCHAR2(20)																											
CurrentTransformerSampleFamilyID	Current Transformer Sample Family ID		201000298	VARCHAR2(20)																											
CurrentTransformerTestDate	Current Transformer Test Date		01-01-2020	dd-mm-yyyy																											
VoltageTransformerTest	Voltage Transformer Test		Tested	VARCHAR2(20)																											
VoltageTransformerSampleFamilyID	Voltage Transformer Sample Family ID		201000298	VARCHAR2(20)																											
VoltageTransformerTestDate	Voltage Transformer Test Date		01-01-2020	dd-mm-yyyy																											

Section No/Field Name	Participant Comments															
Table 52, CATS_NMI_Data	<table border="1" data-bbox="770 292 1921 416"> <tr> <td>TransmissionNodeIdentifier</td> <td>TNI Code</td> <td>NRGE</td> <td>SBER</td> </tr> <tr> <td><u>TransmissionNodeIdentifier</u> 2</td> <td><u>TNI Code 2</u></td> <td><u>NRGE</u></td> <td><u>SBER</u></td> </tr> </table> <p data-bbox="763 456 1928 560">To avoid confusion, the examples provided should be reflective of what can be expected in reality. We suggest that the TNI2 field for the basic meter example should be left blank, while the TNI2 field for the interval meter should have a different value from the TNI field</p>				TransmissionNodeIdentifier	TNI Code	NRGE	SBER	<u>TransmissionNodeIdentifier</u> 2	<u>TNI Code 2</u>	<u>NRGE</u>	<u>SBER</u>				
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Table 52, CATS_NMI_Data	<table border="1" data-bbox="770 600 1921 746"> <tr> <td>HouseNumber</td> <td>House Number</td> <td>6</td> <td>10</td> </tr> <tr> <td>HouseNumberSuffix</td> <td>House Number Suffix</td> <td>A</td> <td>B</td> </tr> <tr> <td><u>HouseNumberTo</u></td> <td><u>House Number To</u></td> <td><u>4</u></td> <td><u>5</u></td> </tr> </table> <p data-bbox="763 786 1928 890">To avoid confusion, the examples provided should be reflective of what can be expected in reality. We suggest that the HouseNumberTo field have a value that is higher than the HouseNumber field</p>				HouseNumber	House Number	6	10	HouseNumberSuffix	House Number Suffix	A	B	<u>HouseNumberTo</u>	<u>House Number To</u>	<u>4</u>	<u>5</u>
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6. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Procedure vs Guideline	<p>We note that there are obligations defined in the guideline but not in the procedure. We understand that guidelines are non-enforceable and are usually supporting documents to a procedure. We suggest that AEMO move all the obligations from the guideline to the appropriate procedures to ensure that they are enforceable and for consistency with AEMO's Retail Electricity Market Procedures framework.</p> <p>For example, all the codes defined in section 11 of the Standing Data for MSATS Guideline would be more appropriate in section 4 of the CATS Procedure where some of the MSATS standing data codes definition are located. Another example is the definition of each characters in the ReadTypeCode field should also be defined in section 4 of the CATS Procedure.</p>
Shared Isolation Point ID and NMI Discovery 4	<p>The purpose of the Shared Isolation Point Flag is to help reduce wasted site visit for a meter change when it is known that a premises has a shared isolation point. This information must allow participants to discover the following:</p> <ul style="list-style-type: none"> a) Whether the isolation point for a metering installation is a shared fuse b) Who is the FRMP for all the impacted metering installation under a shared fuse <ul style="list-style-type: none"> i. If the retailer is the FRMP for all impacted metering installations then the retailer can arrange for the temporary isolation themselves ii. If the retailer is not the FRMP for all impacted metering installations then the retailer can arrange the temporary isolation with the other retailers <p>We believe that having a Shared Isolation Point Flag field with allowable values of Yes, No and Unknown would only meet requirements (a) above. To meet requirements (b) above, we believe that the following is required:</p>

1. an addition field is required to indicate which NMIs are associated with the same shared isolation point.
2. A new NMI Discovery is required

For the additional field we suggest a new field called Shared Isolation Point ID be added. Each shared isolation point is to be assigned a unique id by the LNSP and this unique id is to be applied to the Shared Isolation Point ID field of each NMI that is associated with the shared isolation point.

For example, say there were three units that had metering installations under a shared fuse and a meter protection device was installed when an interval meter was installed for unit 1, then the following information will be available:

NMI	Address	SharedIsolationPointID	SharedIsolationPointFlag
431ABCD123	Unit 1	SISPXYZ	N
431EFGH456	Unit 2	SISPXYZ	Y
432JKLM789	Unit 3	SISPXYZ	Y

Now, if unit 1 requires another meter change then the above information indicates that the metering installation can be isolated without impacting other metering installations. If unit 2 requires a meter change then the above information indicates that a temporary isolation will impact units 1 and 3. A new NMI Discovery, lets call it NMI Discovery 4, should be developed to allow for the discovery of the FRMP for the NMIs of units 1 and 3.

We wish to highlight that this new NMI Discovery 4 must not be dependent on the SharedIsolationPointID or SharedIsolationPointFlag fields because a shared fuse scenario can be identified by a metering provider before these two fields are populated and therefore the retailer should have the opportunity to use the NMI Discovery 4 straight away, by using meter numbers or

	<p>addressing information, to identify the FRMPs in order to advance a meter change as quickly as possible.</p>
<p>XML schema</p>	<p>It is expected that a new aseXML schema is required to support the proposed changes. However it is not clear if this schema change will be a mandatory schema change for every market participant or if this schema change is optional and a market participant can stay on a n-1 schema version. Could AEMO clarify this?</p> <p>If the schema change is mandatory then we believe that 8 months notice for the effective start date is too short given that market participants cannot choose to de-risk their project by staying on a n-1 schema. We suggest that at minimum of 18 months notice should be provided if the schema change is mandatory.</p>