

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: Evoenergy

Completion Date: 29 May 2020

<https://www.aemo.com.au/consultations/current-and-closed-consultations/msats-standing-data-review>

Table of Contents

- 1. Context 3
- 2. Questions raised in the MSATS Standing Data Review Issues Paper 3
- 3. Proposed Changes in Standing Data for MSATS Guideline 13
- 4. Other Issues Related to Consultation Subject Matter..... 18

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?	Any customer refusal to have a type 4 meter with comms would want that known to any prospective retailer. In the same instance, it would be extremely useful for the new MP to know what implications and technologies to explore where a customer has requested new metering, but an exemption is in place. Field only needs to have a value 1 or 2, with 1 being customer initiated, 2 being exempt.
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?	It would be preferred to list all the available enumerated values, otherwise you make this field varchar, but that means possibility of rubbish values.
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	Best mechanism would be via a new B2B OWN – Shared Fuse – Replaced, with the contained completion and date within that automatically

Information Category	Question No.	Question	Participant Comments
			triggers a CR5051 from the LNSP systems to update MSATS.
GPS Coordinates	4.	Please explain the benefits for expanding the GPS coordinates field to cover all NMIs 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)?	As detailed in the many responses from Distribution businesses, there is no benefit to capture this information on existing meters where data was not previously captured.
	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 Queensland NMIs 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?	As per Ausgrid response, this field should be Required only.
	6.	Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.	As detailed in the many responses from Distribution businesses, this will require system changes, resource allocation therefore cost, that the incumbent MPB will not have any recourse to recover.

Information Category	Question No.	Question	Participant Comments
			Agree that meter exchanges, meter churns and new connections should be included in capturing GPS location details.
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	This field is not used by Evoenergy
	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.	AEMO and Tas Networks should discuss this further for consideration. Preferred option is to remove the field.
	9.	Do you agree with retaining the Network Additional Information field?	No, as it does not provide value to the process. If Tasmania use it for their meter register circuit information, then make it Required for them, and Not Required for all others.

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)?	Option 2

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?	Option 1
	12.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	N/A
	13.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	N/A
	14.	If you choose Option 2c, please choose between for i(a) or i(b).	N/A
	15.	Do you have any further comment regarding the above?	Nil
Scenario 3: Amend an existing field (To Amend)	16.	For Amended fields, would you prefer Option 1, 2a, 2b, 3, 4 or 5?	Option 1
	17.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	N/A
	18.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	N/A

Information Category	Question No.	Question	Participant Comments
	19.	Please provide any further details required	Nil
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	Option 2
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	Prefer csv file to manage only those uploads necessary for Evoenergy business.

2.3 Other Matters

Information Category	Question No.	Question	Participant Comments
Consumer Data Right	22.	Do you agree with the proposed new fields?	The new proposed fields accommodate the ACCC requirements, but why have the flag for when an account holder changes? Will a Retailer change also set this flag?
	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?	<p>This meets minimum requirements, but the 'Change in Account Holder' values, what are they expected to be?</p> <ol style="list-style-type: none"> 1. If "Yes" value, then keeps it simple for AEMO. When they get a data sharing request, using the dates from that and the new fields they could do an API call to the retailer/s in that period/s for validation before providing data. Even a third party would still have to quote the customer details. 2. If it is going to have customer details should it also have the phone number for verification that you have the correct person? 3. Should it be a repeating field to accommodate many names?

Information Category	Question No.	Question	Participant Comments
			<p>4. How many verifications are expected in each businesses system?</p> <p>5. Will it be an API call from AEMO to the Retailer for validation of details before seeking from the 'Data Holder' (DH) the metering data (should the DH do any verification before releasing data)?</p>
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	How do you know if J Doe is the same J Doe, or if John and Jane Doe have a messy separation, without having more information that the retailer would hold?
	25.	Do you agree with the timeframe for updating the data in these fields?	No, as more detail needs to be provided and determined on what is the correct and most efficient way forward.
	26.	Are there other suggestions to help meet the ACCC's objective?	<p>Why not have the flag set by the Accredited Data Recipient (ADR) that determines if data can be shared or not and from what date as that is what the customer would have consented (not exceeding 2 years)?</p> <p>If the ADR was the one that verified and validated the customer information by doing a defined protocol API to the Retailers systems, and the retailer verifying that information as true or false, then when request sent to AEMO, no</p>

Information Category	Question No.	Question	Participant Comments
			requirement for any other complexities as other participants in the flow only need the NMI if from AEMO.
	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	<ol style="list-style-type: none"> 1. MPB's are failing to follow the direction of the retailers meter install request e.g. by submitting the obsolete energy tariff for all data streams. 2. The Meter install request detailed the new NTC to be a legislated feed-in-tariff (FiT) code, or Net Generation, but the MPB loaded to MSATS a B stream with a standard energy NTC, resulting in customer complaints and manual rectification along with loss of revenue for the customer. 3. When adding the meter to MSATS, fail to also add all the registers and suffix's, e.g. only add the E stream (even though B stream configured in meter for the new PV generation) in that first transaction. Result in customer complaints and manual rectification to now add, or in some cases, loss of revenue for the customer, or retailer and network as not rectified within MSATS allowable timeframes.

Information Category	Question No.	Question	Participant Comments
	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 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>Option a) would not address some of the issues as mentioned above in Q27.</p> <p>Option b) is in place now, but in some cases, the retailer also gets it wrong.</p> <p>Option c) is BAU.</p> <p>Option d) is preferred, with caveats.</p> <p>LNSP must be able to update the NTC with site status A, D, N, or G to meet the 3 business days. This would be much more flexible and improve processing and automation. Alternatively, the NTC should be updated within 3 business days of the site status being changed to A.</p> <p>Make the field Required for the MPB.</p> <ol style="list-style-type: none"> 1. Whatever they were passed from the retailer they must populate, as this would put the responsibility on multiple parties. 2. If blank, three business days (with above caveats) for the networks to populate after receipt of the CR300x.

Information Category	Question No.	Question	Participant Comments
			<p>3. No ability for the MPB to update NTC for 1-4 meters via a CR3051.</p> <p>4. Improved reporting on MPB. Current reports by AEMO track NMI status and when updated timeframes. Is there a similar report for MPB (or MDP data streams) that monitors if a meter was added to MSATS within defined timeframes? Maybe the new Type 5 & 6 report to identify why new meter's installed or changed could be expanded.</p>
	29.	Do you have any comments on the options provided by Endeavour Energy?	<p>Do not like option 2 as this would restrict flexibility in retailers or networks ability to offer new innovative tariff structures.</p> <p>Option 1 was in place for many years, with NTC Optional for the MPB. Preferred if option d) above adopted.</p>

3. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments
4.1.4, 4.2.4, 4.3.4, 7.1.4, 7.1.5, 7.2.3, 7.3.4, 9.1.4	What is the "House Number To"? Could not find it in any of the consultation draft reports or any description on why it was getting introduced. Using the example for Standing Data for MSATS Guideline, if a participant does a NMI Discovery for 8 Smith St, will they get this NMI back as a result?

4. Proposed Changes in MSATS Procedures - CATS

Section No/Field Name	Participant Comments
2.7	Reference appears to be incorrect when viewing PDF, as shows "O" and 13.6 removed, but when you select it, then takes you to the correct area.
9.1.4, 9.2.4, 9.3.4, 9.4.4, 12.2.4, 12.2.5, 12.3.4, 12.5.4, 15.1.4	What is the "House Number To"? Could not find it in any of the consultation draft reports or any description on use. Using the example for Standing Data for MSATS Guideline, if a participant does a NMI Discovery for 8 Smith St, will they get this NMI back as a result?

5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments																					
9. Table 8	<p>TimeOfDay – As per the Guide to MSATS Web Portal Table 6, and following consultation for Five Minute Settlement – Metering Procedure Changes (Package 3) Standing Data for MSATS v5.0, this field should align. All participants are using this value in the CR30xx now, please update this document to align to NEM practice. Please include the following wording to clarify description.</p> <p>For Interval meters, use code “INTERVAL”.</p>																					
13.3 Table 24	<p>Example CATS_REGISTER_IDENTIFIER for the TimeOfDay and ControlledLoad are incorrect and do not match allowed values in Table 16 and 17 respectively</p> <table border="1"> <thead> <tr> <th>Data Element:</th> <th>Serial Number</th> <th>Register ID</th> <th>UnitOf Measure</th> <th>Time Of Day</th> <th>Suffix</th> <th>Controlled Load</th> </tr> </thead> <tbody> <tr> <td>Values</td> <td>ABCD1111</td> <td>01</td> <td>KWH</td> <td>ALLDAY</td> <td>11</td> <td>No</td> </tr> <tr> <td></td> <td>XYZA1112</td> <td>01</td> <td>KWH</td> <td>CONTROLLED</td> <td>42</td> <td>CL1</td> </tr> </tbody> </table>	Data Element:	Serial Number	Register ID	UnitOf Measure	Time Of Day	Suffix	Controlled Load	Values	ABCD1111	01	KWH	ALLDAY	11	No		XYZA1112	01	KWH	CONTROLLED	42	CL1
Data Element:	Serial Number	Register ID	UnitOf Measure	Time Of Day	Suffix	Controlled Load																
Values	ABCD1111	01	KWH	ALLDAY	11	No																
	XYZA1112	01	KWH	CONTROLLED	42	CL1																
13.4 Table 26	<p>Example CATS_REGISTER_IDENTIFIER for the TimeOfDay and ControlledLoad are incorrect and do not match allowed values in Table 16 and 17 respectively</p> <table border="1"> <thead> <tr> <th>Data Element:</th> <th>Serial Number</th> <th>Register ID</th> <th>UnitOf Measure</th> <th>Time Of Day</th> <th>Suffix</th> <th>Controlled Load</th> </tr> </thead> <tbody> <tr> <td>Values</td> <td>ABCD1111</td> <td>1</td> <td>KWH</td> <td>PEAK</td> <td>11</td> <td>No</td> </tr> </tbody> </table>	Data Element:	Serial Number	Register ID	UnitOf Measure	Time Of Day	Suffix	Controlled Load	Values	ABCD1111	1	KWH	PEAK	11	No							
Data Element:	Serial Number	Register ID	UnitOf Measure	Time Of Day	Suffix	Controlled Load																
Values	ABCD1111	1	KWH	PEAK	11	No																

Section No/Field Name	Participant Comments						
		ABCD1111	2	KWH	CONTROLLED	41	CL3
13.5 Table 28	Example CATS_REGISTER_IDENTIFIER for the TimeOfDay and ControlledLoad are incorrect and do not match allowed values in Table 16 and 17 respectively						
	Data Element:	Serial Number	Register ID	UnitOf Measure	Time Of Day	Suffix	Controlled Load
	Values	ABCD1111	1	KWH	PEAK	11	No
		ABCD1111	2	KWH	SHOULDER	21	No
		ABCD1111	3	KWH	OFFPEAK	31	No
		ABCD1111	4	KWH	CONTROLLED	41	CL3
13.6 Table 30	Example CATS_REGISTER_IDENTIFIER for the TimeOfDay are incorrect and do not match allowed values in Table 16 and 17 respectively						
	Data Element:	Serial Number	Register ID	UnitOf Measure	Time Of Day	Suffix	Controlled Load
	Values	ABCD1111	01	KWH	PEAK	11	No
		ABCD1111	02	KWH	OFFPEAK	21	No
		XYZA1112	05	KWH	CONTROLLED	42	CL2

Section No/Field Name	Participant Comments
14.1 All Tables with TimeOfDay examples	The Value of "ALLDAY" is inconsistent with the Guide to MSATS Web Portal page 59, which specifies the value for Interval meters must be "INTERVAL". All participants are using this value in the CR30xx now, please update this document to align to NEM practice.
17. Table 54	TimeOfDay interval example should be "INTERVAL" as per Standing Data for MSATS v5.0

6. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
<p>MSATS Standing Data Review Draft Report</p> <p>4.3.2</p>	<p>Adding the “Field 2: Sample Family ID” does not add value to any market participant.</p> <p>Adding “Field 1” is sufficient.</p> <p>Adding “Field 3: Date” may be anti-competitive as it could deter retailers winning/keeping that customer if they know it is going to incur cost if test required.</p>
<p>MSATS Standing Data Review Draft Report</p> <p>5.1.3 Meter Use</p>	<p>Do not see benefit of adding “Solar/PV” as an enumerated value. If you look at the other values, they are stating a specific principle for having this meter, whereas “Solar/PV” is getting more into the detail, and this information is conveyed in various other fields in MSATS. If this stays then must add Wind, Methane, Geothermal, Natural Gas, Coal, Wave/Tidal, Hydro, Nuclear, Fusion, Battery, Diesel/Petrol/LPG/CNG/Oil.</p>