

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: Origin 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?	<p>Origin Energy's view is that the potential benefits of providing enhanced access to exemption information would be reduced market costs for the new Retailer as it will assist with the next steps to take with the customer i.e. exemption because of the non-availability of remote communications.</p> <p>The issue is around timing for the population on this information. Origin Energy proposes that where there is a change that results in the communications being restored, then a timeframe of when this should be updated in MSATS as well as the responsible party should be defined.</p> <p>In addition, MC's will have the ability to use MSATS to determine if an exemption exists and need to be managed as part of the metering installation and to be able to apply for a new exemption (with</p>

Information Category	Question No.	Question	Participant Comments
			investigation and evidence) based on the flag transfer of MC.
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?	Origin Energy support the proposed example provided by AEMO (500kV: 110V: 110V: 230V).
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	<p>Origin Energy proposes two options for the MP/MC to advise the LNSP.</p> <p>Option 1- Through B2B via the “SiteAccessNotification” by including an additional Value of “SharedFuse” to the “HazardDescription” field. The LNSP can then use that information to update MSATS.</p> <p>Option 2 – When the “Not-Complete” service order is returned by the MP to the Retailer, the LNSP uses the notified party transaction.</p> <p>Origin Energy would like to reiterate to get full value out of this field, industry should consider a method for linking all shared supply points together (such as a code that applies to all the NMI’s on the same shared supply) to reduce overall industry cost in needing to maintain this data.</p> <p>There is also value where the LNSP is aware a NMI is flagged for life support to provide this information</p>

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			for any of the MP's/MC's that intend to isolate the site.
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)?	Origin Energy propose that GPS coordinates should be at a meter level not the NMI level. Most issues are in rural areas where MP's are unable to locate a meter or where there are multiple meters across a site. This is less of an issue for multi-floor buildings however there is benefit to have Floor Location.
	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?	Metro, Regional and Remote can be used in other jurisdictions so definition should be used across the NEM. By have this information it will assist with the Meter Installation timeframes.
	6.	Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.	Origin Energy suggest to not limit this information for just rural and MRIM sites rather should be extended to all sites as it will assist in supporting the rollout of smart meters. It will also assist in mitigating address issues across the NEM.

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			<p>Origin Energy agree with AEMO's proposal to have this field as 'mandatory for all new connections and all meter exchanges and meter churns sites.</p> <p>This approach will allow time and opportunity for multiple meter readings that are accurate for "all" sites as proposed not just rural and MIRM sites.</p>
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	<p>Origin Energy use this for site specific location details where the GPS coordinates may not be accurate i.e. which road to turn down.</p> <p>This field can also provide details that may not be updated elsewhere. Useful additional details include information for Meter Configurations, Networks Tariff and site/location.</p>
	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.	Origin Energy support the introduction of a Meter Location field as it can be useful with GPS coordinates to give an indication of how to locate the meter. An increased character length would be beneficial to allow for more information.
	9.	Do you agree with retaining the Network Additional Information field?	<p>Origin Energy support retaining the Network Additional Information field.</p> <p>Can AEMO confirm if there is a set character limit for this field?</p>

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)?	Origin Energy support Option 1 (Retain History) for visibility purposes.
Scenario 2: Add a new field (Proposed Fields)	11.	For Added fields, would you prefer Option 1, 2a, 2b, 2c, 3, 4 or 5?	Origin Energy's preference is for Option 4. This will allow a field by field review the ability to either just fill as you go (CR inbound), or AEMO derive from existing data and fill, or participants fill using a Bulk Data Tool from their own data sources to pre-seed the new value.
	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?	If industry is going to effort to create new fields to create value for the market it makes sense to populate the most valuable field using the most effective mechanism i.e. if a updating individual sites by CR's will take months/years to complete then having the option of a bulk change would be beneficial

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Scenario 3: Amend an existing field (To Amend)	16.	For Amended fields, would you prefer Option 1, 2a, 2b, 3, 4 or 5?	Origin Energy's preference is for Option 4. This will allow a field by field review the ability to either just fill as you go (CR inbound), or AEMO derive from existing data and fill, or participants fill using a Bulk Data Tool from their own data sources to pre-seed the new value.
	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
	19.	Please provide any further details required	For efficiency whether the fields are new or amended the same process can be applied to both to allow for a one pass process.
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	Origin Energy's preference is Option 1. This is because the SDR is updated daily via C1 reports and pick up any changes in the standing data as they are carried out. A snapshot reconciliation can also be carried out post changes for a sanity check.
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	N/A

2.3 Other Matters

Information Category	Question No.	Question	Participant Comments
Consumer Data Right	22.	Do you agree with the proposed new fields?	<p>Origin Energy seek clarification on the following:</p> <p>How would the account holder be defined? If a secondary account holder was added or deleted – would this trigger a change in account holder notification? A customer may have multiple NMI – is there functionality to send to all NMIs?</p> <p>In addition this field would need to cater for both in-situ (move-in with the same FRMP) and transfer (new customers with new FRMP). Also note the latter has implications from a Customer Switching perspective, where the losing FRMP does not get notified until the transfer is completed. If the account holder goes from a single customer to joint, is that deemed to be a change?</p> <p>Origin Energy believes that it is inappropriate that this change has been requested to MSATS given that there has been no discussion nor consultation with industry over authentication/authorisation models for Consumer Data Right. Due process should be followed where the ACCC consults on the proposed authentication model, a decision is made and then requests are made to the relevant regulatory instruments to accommodate the ACCC's decision. Data should not be released without the appropriate authentication that the data is relevant to the person who is requesting the data. Origin Energy believes that there are potential privacy risks</p>

Information Category	Question No.	Question	Participant Comments
			with the removal to requirement to verify customer details with the party who holds this information. The risks are increased with the proposed broadness of the terms 'customer' and 'associate' in the Energy CDR Designation Instrument.
	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>AEMO propose to include 2 fields:</p> <ol style="list-style-type: none"> 1. Change of Account Holder 2. Change of Account Holder Effective Date <p>Origin Energy seek clarification on the following:</p> <ul style="list-style-type: none"> • Can AEMO confirm what the character limit for this field ? • In case of Liquidation ? how will this be handled from Account holder prospective change on standing data? • Insolvency name ? how will this be handled and from Account holder prospective change on standing data <p>Consideration also needs to be given to take into account privacy aspects i.e. customers personal situation and the proposed broadness of the terms 'customer' and 'associate' in the draft Designation Instrument. There is the potential for data relevant to an 'associate' to be released with a general CDR request. The terms need to be refined in the Rules</p>

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			<p>The broadness of these terms need to be determined prior to setting standards in MSATS.</p> <p>Note: the Data Standards Body is currently consulting on the data standard for CDR. There has been debate over 'what is an account' and how it should be defined for CDR purposes. Any changes to MSATS should reflect the standards developed by the Data Standards Body to minimise confusion and costs.</p>
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	<p>As part of the customer switching rules, AEMO has proposed that customers will be able to switch between retailers and products on a 65 business day retrospective basis. Thus, when the customer enters into a new product plan, the customer could change or the details of the customer could change on a 65 business day retrospective basis. Therefore, change of customer details could also occur on a 65 business day retrospective basis.</p> <p>This will need to be addressed. There are specific concerns in relation to renters, For example, you may have 3 renters in a premises, one renter moves out and the new renter changes the name in which the electricity plan is in for the premises. Under the customer switching rules, the new renters name on the account can be backdated up to 65 business days. Questions are then asked when there has been a change of account (65 business days prior or at the time of taking up the new contract)? This has flow on implications to the management of</p>

Information Category	Question No.	Question	Participant Comments
			customers and what data the consumer is entitled to receive.
	25.	Do you agree with the timeframe for updating the data in these fields?	Origin Energy is of the view that timeframes should be reflective of current market timeframes.
	26.	Are there other suggestions to help meet the ACCC's objective?	The ACCC should consult on the proposed authentication models prior to any consideration or decisions in relation to proposed amendments of MSATS procedures. We do not believe that it is appropriate to consider this issue at this time.
	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	N/A
	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 	Origin's Energy preference is Option D. The NTC is set by the LNSP not the MP. In addition, a change to the NTC is subject to approval by the LNSP. The MP should have the option however to update the tariff post meter install, correct an NTC if populated incorrectly or if the tariff is not updated in a timely manner.

Information Category	Question No.	Question	Participant Comments
		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	
	29.	Do you have any comments on the options provided by Endeavour Energy?	There are many instances where there is more than one NTC for all meters on an installation. Especially where there is Controlled Load. This would be a serious limitation to Option 2.

3. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments

4. Proposed Changes in MSATS Procedures - CATS

Section No/Field Name	Participant Comments

5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments

6. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Consumer Data Right	Origin Energy request AEMO to wait for the ACCC to make a decision on an authorisation model prior to consulting on changes to the MSATS procedures. In addition, there is concern around the lack of customer verification and the verification process.
Solar and Battery Information	Origin Energy maintain that there is value on new fields being created for solar or batteries. This will assist Retailers in understanding what is exactly at site such as panel size and tailor offers to customers specific needs.