

## 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: PLUS ES***

***Completion Date: 5/6/2020***

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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>PLUS ES identifies the following key issues:</p> <ul style="list-style-type: none"> <li>• MC has the obligation to maintain the information of customer refusal and ensure that a metering installation is enabled with communications. However, they are not the participants who have the customer relationship, interaction and knowledge of customer movements (move in/move out).</li> <li>• A FRMP may not have the visibility to the reason why the site is an MRAM, but they do have the customer relationship,</li> </ul>

Information Category	Question No.	Question	Participant Comments
			<p>interaction and knowledge of customer movements (move in/move out).</p> <ul style="list-style-type: none"> <li>Enhanced access to this information would enable the FRMP or the MC to reinstate communications to a metering installation once the customer who provided the refusal moved out.</li> <li>MRAM meters add burden on all parties involved (the MC/MP, FRMP and customer), to collect the data and manage the metering installation; i.e. increased costs, process efficiency challenges, resourcing and compliance.</li> </ul>
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?	PLUS ES does support the premise of the question in the first place. Additional secondary windings on a VT do not have any relevance unless they are associated with market metering – and typically they are not.

Information Category	Question No.	Question	Participant Comments
			<p>This also illustrates the shortcoming of trying to model asset management features in a Market Settlement And Transfer Solutions (MSATS) system, which is not designed for this purpose. There are interrelationships between CT's, VT's and the rest of the metering installation that need to be maintained by the MP and MC. Trying to reflect some of this in MSATS becomes a burden without a benefit. PLUS ES maintains that such information should be abstracted up to a level that is relevant for the MSATS role of managing market transaction and administration. As per previously provided example, maintaining a simpler identifier for the configuration of a site being WC, or LVCT or HV would be more effective. This is relevant to all parties and would be more accurately and easily maintained</p>

Information Category	Question No.	Question	Participant Comments
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	<p>PLUS ES believes there are a few mechanisms available to instigate shared isolation point status changes. Without understanding the procedure, hard to conclude on one. i.e.</p> <p><b>Identification</b> of the shared isolation point –</p> <p>The identification of a shared fuse can be determined by the LNSP or metering participant. There are currently a few mechanisms which the LNSP may be informed about a shared fuse pertaining to a metering installation</p> <ul style="list-style-type: none"><li>• a retailer informing the LNSP of a Temp isolation via a B2B SO (the MP potentially advising the retailer of the identified isolation point) or other B2B mechanisms.</li><li>• an agreement of off market communications i.e. emails</li></ul> <p><b>Status change/update:</b></p>

Information Category	Question No.	Question	Participant Comments
			<ul style="list-style-type: none"> <li>• The most efficient way could be a field in a CR sent to the Market when updating metering installation information. This would remove the dependency of the LNSP to be the ‘middleman’/ administrator for an activity which more than likely was undertaken by the MP/MC. It would also align in principal with other updates in MSATS.</li> </ul> <p>Furthermore, with respect to the proposal,</p> <ul style="list-style-type: none"> <li>○ the ‘Party to Provide’ column must be updated to LNSP/MPB in the Standing Data for MSATS doc</li> <li>○ Updates to the CATS for the recommended CR which would allow an MP to update and</li> <li>○ procedures developed to clearly articulate the activities and the responsible parties.</li> </ul>

Information Category	Question No.	Question	Participant Comments
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)?	<p>GPS is only relevant and useful when the already available geographic references cannot easily determine the metering location. In most cases, the address details are rich enough to find the meter.</p> <p>Mandatory GPS co-ordinates for all metering is a nice to have and only for a small volume of the metering population will it deliver the perceived benefits.</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 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?	<p>PLUS ES has no alternate proposal to this but does not support Designated regional area postcodes either.</p> <p>For example, a major town could potentially fall into the designated regional area postcode. The built-up zone of such postcodes wouldn't generally present challenges in locating a meter.</p> <p>It is not consistent enough to utilise a fixed definition for address characteristics to</p>

Information Category	Question No.	Question	Participant Comments
			<p>determine when GPS coordinates are mandated. This alone will not holistically meet the objective which GPS co-ordinates are trying to solve.</p>
	6.	<p>Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.</p>	<p>PLUS ES does not agree with AEMO’s proposal for the reasons identified in Q4 &amp; 5 and the below.</p> <p>The cost benefit analysis of the mandatory provision of GPS co-ordinates for all metering is questioned. This exercise will be very costly and deliver limited benefits.</p> <p>GPS is only relevant and useful when the already available geographic references cannot easily determine the metering location. In most cases, the address details are rich enough to find the meter.</p> <p><b>Manually read meters:</b> It is incorrect to consider that collecting GPS data as part of meter reading as reasonable, because meter</p>

Information Category	Question No.	Question	Participant Comments
			<p>reading cost is already optimised to a minimum. Any additional logistical tools and resourcing to collect GPS coordinates would cause a significant cost increase with little benefit.</p> <p><b>Rural sites:</b> Irrespective of how the rural sites are defined it will still require additional resourcing and costs:</p> <ul style="list-style-type: none"> <li>• additional complex system logic</li> <li>• field resourcing in potentially sparsely populated areas to record GPS coordinates for already exchanged metering.</li> </ul> <p>PLUS ES proposes that GPS coordinates for existing remote read meters be mandated when the metering installation requires a field visit. For example,</p> <p>(a) after a metering installation is visited for other maintenance purposes; and</p>

Information Category	Question No.	Question	Participant Comments
			<p>(b) metering installation – meter exchange or new connection.</p> <p>This would render the field <b>required</b>.</p> <p>This approach maintains the implementation cost to a reasonable level while maximising the usefulness of the process.</p>
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	PLUS ES does not currently use the Network Additional field.
	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.	<p>Not sure without knowing the details maintained in the Network Additional Information field.</p> <p>PLUS ES wants to ensure in the scenario that there is another field suitable to apply the Network Additional Information, one participant should not be able to overwrite the details added by another. I.e. MP's details are maintained, if a LNSP adds details to the same field and vice versa.</p>

Information Category	Question No.	Question	Participant Comments
	9.	Do you agree with retaining the Network Additional Information field?	PLUS ES has no comment.

## 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)?	<p>PLUS ES prefers option 2 for removed fields.</p> <ul style="list-style-type: none"> <li>No benefit in retaining fields where the data will become obsolete due to the inability to update.</li> <li>Fields are being removed as they are not currently populated, or the majority of participants have agreed to remove as they do not add value.</li> </ul>
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 4: see appendix for preferred method.

Information Category	Question No.	Question	Participant Comments
	12.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	No comment
	13.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	No comment
	14.	If you choose Option 2c, please choose between for i(a) or i(b).	No comment
	15.	Do you have any further comment regarding the above?	See comment in General Section
Scenario 3: Amend an existing field (To Amend)	16.	For Amended fields, would you prefer Option 1, 2a, 2b, 3, 4 or 5?	Option 4:
	17.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	No comment
	18.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	No comment
	19.	Please provide any further details required	PLUS ES notes that the method depends on the field considered.

Information Category	Question No.	Question	Participant Comments
			Further recommend: <ul style="list-style-type: none"><li>• that a validation is performed on existing data before amending fields</li><li>• when new fields are created for existing data, to separate existing fields, the existing fields should only be removed once the participants are comfortable that the data has been populated in the new fields. i.e Transformer Ratio (existing) split to CT Ratio and VT Ratio (new fields)</li></ul>
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	PLUS ES preference is Option 1
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	No comment

## 2.3 Other Matters

Information Category	Question No.	Question	Participant Comments
Consumer Data Right	22.	Do you agree with the proposed new fields?	<p>It is hard to make a comment when there is not enough detail on the proposed fields. i.e. Will these two fields be flags or would they contain the account holder's details?</p> <p>PLUS ES understands that this information will have to be provided somehow but questions if this information is to be stored in MSATS. If so, it then sets a possible precedent for other customer related data to be included in MSATS. One could argue the Market settlement and transfers solution is not the database for this information and its intended use.</p>

Information Category	Question No.	Question	Participant 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?	<p>The fields proposed will not deliver any value unless one is able to validate the customer consenting is the customer account holder.</p> <ul style="list-style-type: none"><li>• A customer has changed FRMP but remains the account holder of the site.</li><li>• A customer has moved and changed FRMP How is the FRMP to validate the account holder</li><li>• A customer has moved out but the FRMP is the same.</li></ul> <p>Retailers systems are based on the account holder/customer, MSATS has the NMI as a Unique identifier and is not a customer database.</p>
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	Not enough detail on the fields to determine consequences.

Information Category	Question No.	Question	Participant Comments
	25.	Do you agree with the timeframe for updating the data in these fields?	PLUS ES believes it is reasonable as it would have to be automated and Retailers will incur system changes for these fields.
	26.	Are there other suggestions to help meet the ACCC's objective?	No comment
NTC	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	<p>Since the commencement issues experienced:</p> <ul style="list-style-type: none"> <li>• MPB receive late notice of tariff changes which places undue pressure on the MPB to update their systems accordingly.</li> <li>• Sometime PLUS ES finds out indirectly from other retailers there are tariff changes</li> <li>• The above are experienced annually (mid-year) when tariff changes are made</li> </ul>

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"><li>a) Compliance options for MPB performance for incorrectly populating NTC</li><li>b) Retailer obligations to inform the MC and MPB of the appropriate NTC</li><li>c) Network obligations to correct an incorrectly populated NTC within three business days; and or</li><li>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</li></ul>	<p>PLUS ES prefers option c) which is current practice.</p> <p>Alternatively, an MP uses the NTC for a utilisation of the meter and then the LNSP determines and applies the correct NTC.</p>

Information Category	Question No.	Question	Participant Comments
	29.	Do you have any comments on the options provided by Endeavour Energy?	PLUS ES comments on the 2 options: -Option 1 - We are unsure whether the register information alone provides enough detail of the metering installation configuration to enable the network to determine accurately the NTC. - Option 2 – the proposal looks very similar to a utilisation code.

### 3. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments
General	Field/Value comments proposed by PLUS ES and accepted in the Section 2 of this document, should be reflected in the WIGS Procedures, where applicable.
General across multiple CRs – GPS coordinates	PLUS ES queries whether GPS Coordinates in the applicable CR tables be updated to reflect GPS CoordinatesLong and GPSCoordinatesLat, as per the Standing Data for MSATS document.

## 4. Proposed Changes in MSATS Procedures - CATS

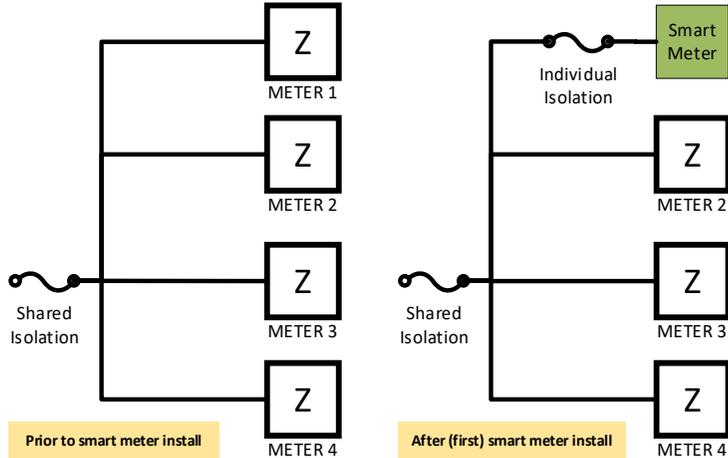
Section No/Field Name	Participant Comments
General	Field/Value comments made and accepted in the issue paper section should be reflected in the CATS Procedures, where applicable.
General across multiple CRs – GPS coordinates	PLUS ES queries whether GPS Coordinates in the applicable CR tables be updated to reflect GPS CoordinatesLong and GPSCoordinatesLat, as per the Standing Data for MSATS document. Also applicable Table 16-C
2.7 Retailer of Last Resort	Typo – <b>refer to section 13.6</b> has been changed to <b>refer to section 0</b> . Section 13.6 is the valid section
16.1 Introduction (c)	Hyperlink naming correction Error! Reference source not found: Table 16-C
16.3.3 CATS Standing Data Access Rules (b)	Hyperlink naming correction Error! Reference source not found:

## 5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments
General	Field/Value comments made and accepted in the issue paper section should be reflected in the WIGS Procedures, where applicable.
Meter Malfunction Exemption Number	PLUS ES supports AEMO's conclusion. In addition PLUS ES recommends, aligning the availability of the field with: <ul style="list-style-type: none"><li>• the automation of the process</li><li>• the updating of the appropriate exemption procedure</li></ul>
Meter Malfunction Exemption Expiry Date	PLUS ES supports AEMO's conclusion. In addition PLUS ES recommends, aligning the availability of the field with: <ul style="list-style-type: none"><li>• the automation of the process</li></ul> the updating of the appropriate exemption procedure

<b>Section No/Field Name</b>	<b>Participant Comments</b>
CT/VT Last Test Date.	<p>PLUS ES does not support the proposed additional transformer fields. This is asset management information and we consider it not appropriate for MSATS.</p> <p>There are various nuances in the way that MC's and MP's will record and manage transformers and the associated database modelling. The proposals would not be correctly reflected in MSATS. This information belongs with individual MC's and MP's asset management systems and not in a market settlement and transfer solution.</p> <p>Furthermore:</p> <ul style="list-style-type: none"><li>• there are MC/MP audits in place to ensure they are complying with their obligations and</li><li>• a last test date could enable the FRMP to discriminate against the customer if a test was imminent due to the prohibitive costs.</li></ul>
CT/VT Accuracy Class	<p>PLUS ES does not support the proposed additional transformer fields. This is asset management information and we consider it not appropriate for MSATS.</p> <p>There are various nuances in the way that MC's and MP's will record and manage transformers and the associated database modelling. The proposals would not be correctly reflected in MSATS. This information belongs with individual MC's and MP's asset management systems and not in a market settlement and transfer solution.</p>

Section No/Field Name	Participant Comments
Proposed Validations for transformer information fields - General	<p>PLUS ES does not support the proposed validations on the basis that maintaining the table, adding new, removing old, to cover valid or invalid combinations – is not addressed.</p> <p>Secondly, PLUS ES believes that this information would impose a burden but not add any value for tasks such as assisting market transfers.</p> <p>The market would get more benefit with a much lower administrative burden by applying a simpler, more abstract detail to manage transformers.</p> <p>PLUS ES proposes that market NMI's be tagged to identify if they are HV, LVCT or WC. This simple information assists FRMP and MC's for market transfers, without the burden of trying to record superfluous information on MSATS</p>
Proposed Validations for transformer information fields - CT Type	<p>PLUS ES do not support the validations as it does not necessarily define all of the nuances of CT's at HV or LV sites. i.e. <b>Other</b> would have to be an enumeration for completeness and one would question the value this enumeration would deliver to the Market.</p>

Section No/Field Name	Participant Comments
<p>SharedIsolationPointFlag</p>	<p>PLUS ES recommends that the shared fuse details captured need to be more detailed to deliver full benefits/efficiencies. It is not sufficient to just identify the shared isolation point upstream. One would also need to model at a meter level. The modelling would have to have a similar concept of parent NMI vs child NMIs.</p> <p>For example,</p>  <p>If the shared fuse is only identified at the isolation point, then one cannot identify that meter 1 has a Meter Protective device (MPD) and would not require a temporary isolation for any future work. This applies for all meters on the same isolation location.</p>
<p>Meter Read Type Code</p>	<p>Proposed as Mandatory in issues paper but required in Standing Data for MSATS doc.</p>

Section No/Field Name	Participant Comments
Meter Use	<ul style="list-style-type: none"><li>• <b>Solar/PV</b> enumeration: there are other fields which this value could be derived from. For example, a revenue meter which has Solar/PV what would one select? PLUS ES recommends this field to be removed.</li></ul>
Time of Day	PLUS ES recommends: <ul style="list-style-type: none"><li>• an additional enumeration of <b>Demand</b>. This is a currently used – a way of describing a register.</li><li>• <b>INTERVAL</b> enumeration should be used for all Interval metering.</li><li>• <b>BUSINESS</b> enumeration – Business is a reflection of the customer. A time of day is a reflection of a period. The Network Tariff against the Register / TOD would reflect business. Hence, propose to not include the enumeration.</li></ul>
Next Scheduled Read Date	<ul style="list-style-type: none"><li>• PLUS ES is querying the requirement of a NSRD for Type 7 metering installations, as they are unmetered.</li></ul>

## 6. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Data Transition	<ul style="list-style-type: none"><li>• PLUS ES has a concern with the options proposing data transition activities using the CR transactions and whether the bandwidth available to Market Participants will be able to cater for the extraordinary large volumes - in addition to BAU volumes.</li><li>• PLUS ES recommends that the analysis of the Data Transition options/methods would be best suited in an IT/Solution Architecture focused forum with system knowledge personnel – a discussion among peers. This approach would also deliver a more informative outcome in a streamlined timeframe.</li></ul>

## 7. Appendix

A first glance of PLUS ES preferred data transition methods for new fields

Field	Data Population Option
<b>G-NAF PID</b>	Bulk – No Notification
<b>TNI2</b>	CRs
<b>meter malfunction exemption number</b>	CRs
<b>malfunction exemption expiry date</b>	CRs
<b>CT Accuracy Class and VT Accuracy Class.</b>	CRs
<b>CT Test and VT Test.</b>	CRs
<b>CT Sample Family ID and VT Sample Family ID.</b>	CRs

<b>CT Test Date and VT Test Date</b>	CRs
<b>CT Location and VT Location</b>	CRs
<b>CT Ratio and VT Ratio.</b>	CRs
<b>CT Type and VT Type.</b>	CRs
<b>Shared fuses</b>	
<b>GPS co-ordinates</b>	Bulk – No Notification
<b>Section and DP Numbers</b>	Bulk – No Notification