

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: Vector Metering

Completion Date: 29 May 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>Vector does not support having a Type4A reason code in MSATS.</p> <p>We do however support the inclusion of any type4a exemption details that have been granted by AEMO under the <i>Exemption Guideline – Small customer meter Installation</i>. e.g. Exemption ID and Expiry date.</p> <p>It is not uncommon for the MC of a competitive meter to change (usually driven by a change of retailer and the commercial agreements between the retailer and the MC), and the MC is usually 'passive' in this transaction. In this scenario the new MC must reapply for any previously granted exemption to maintain the type4a status of a meter (as any exemption for a type4a is 'personal to the current MC') therefore it would be most efficient for the details of the current exemption to be readily available in MSATS. This will streamline the process for both the new MC and AEMO.</p>

Information Category	Question No.	Question	Participant 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 preference.
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	Communication of shared fuse should be via a B2B transaction. Whether a formal B2B transaction is required or not should be determined during an IEC consultation process.
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)?	While AEMO has correctly identified that manually read meters are visited at least 4 times a year offering the opportunity to collect this data with negligible cost, the same is not the case for already deployed contestable meters. Should the MP not have collected the GPS location at the time of installation (there is no obligation to do so) then the MP would be required to revisit the site for no other reason than to collect GPS location (meters cannot provide a GPS location remotely). A meter may not be revisited after original commissioning until is it replaced under an end-of-life scenario. This could be 15 to 20 years later. Any new obligations on collecting this data should only be mandatory when the site is visited for any other reason e.g. fault, inspection, test, alteration.
	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	Vector believes this is creating obligations based on geographical boundaries is unnecessary complex. Once processes have been put in place to capture gps location details for a subset of meter installations i.e. rural, the marginal cost to perform this for <u>all</u> meter installations is low. Should obligations to collect this data be introduced,

Information Category	Question No.	Question	Participant Comments
		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?	we will collect this for <u>all</u> our meters going forward regardless of physical location. Therefore, maintaining a register of designated postcodes is unnecessary.
	6.	Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.	See 4. Above. Some recognition is required for sites that have already been installed and will not be revisited for some time.
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	Vector Metering does not use this 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.	n/a
	9.	Do you agree with retaining the Network Additional Information field?	No preference.

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 1.
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?	No further comment
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.

Information Category	Question No.	Question	Participant Comments
	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	A volumetrics model should be built so that participants can see the number of transactions that are likely to be generated. This will allow them to determine if their connection to MSATS is appropriate.
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	Option 1.
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	We support AEMO exploring the use of replication as an alternate method of updating MSATS data, especially if it could be used to provide near-real-time updates to MSATS data e.g. Meter Register status code.

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 unclear which entity in the MSATS data model that these new fields will be added to.</p> <p>We recommend a new entity call NMI_Customer that contains non-identifying customer information. The FRMP will be able to 'create' a customer record when a customer moves into a site (which need only be unique ID and effective dates) and then update it once a customer moves out. Obviously, it is possible for NMI's to be vacant for a period so none consecutive periods will need to be supported.</p>
	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?	As MC/MP/MDP we are not a designated data holder for CDR therefore have no comment on the solution.
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	Complexities around unknown consumption where the retailer does not know who the customer is at a site will need to be consider and managed appropriately.
	25.	Do you agree with the timeframe for updating the data in these fields?	No comment
	26.	Are there other suggestions to help meet the ACCC's objective?	No comment
	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	We are not aware of any material issues related to NTC population.

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>We are not aware of any material issues related to the NTC population. MPB's are provided this code by the retailer who presumably have agreed this with the customer. While MPB's can perform some course validation to ensure that the NTC is relevant i.e. it is a load control tariff for a load control register it is difficult to do much more than that.</p> <p>Given that assignment of the Network tariff is between the customer, the retailer and the DNSP and is related to billing it makes little sense that it is the MPB that has the responsibility to populate NTC into MSATS and is held accountable if it is incorrect. Therefore, we support moving the population of NTC to the DNSP. Rather than specifying an NTC against each register the MPB should be describing what each register is connected to e.g. General Power and Light, Load control, local generation etc. Based on this information the DNSP's can then assign the correct tariff at a register level.</p>
	29.	Do you have any comments on the options provided by Endeavour Energy?	Both solutions are workable.

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															
<p>9.1.4. LNSP Requirements</p> <p>The New LNSP must:</p>	<p>Making <i>Connection Configuration</i> mandatory will be problematic because the <i>meter installation</i> has not been established at this point NMI is created in the market and therefore the connection configuration is not known. Recommend this is made optional for 'G'reen field NMI's.</p> <p>Also, some consideration is required on how the LNSP will receive the information to populate MSATS and who will provide this. Will it be the retailer via connection paperwork, or will it be the MP after the installation of a meter via the NOMW B2B transaction? Or the ASP in NSW?</p>															
<p>9.3.4.(e) Populate the Change Request with the following information for each meter:</p> <p>Current Transformer Sample Family ID & Voltage Transformer Sample Family ID</p>	<p>Vector questions the usefulness of maintaining a sample family id in MSATS for CT and VT transformers. MC's are permitted to move devices between sample families. This could occur because certain devices within a family are exhibiting higher failure rates than others (could be due to geographical reasons). MC would then re-cast their families in order to drill down on specific conditions suspected of causing the failure. Keeping MSATS in line with internal sample family inventories will be cumbersome and expensive (note: most organisations sample testing programs are not connected to the market systems). It is also not clear how a participant external to the MC would make use of this information. Unless there is a demonstrable benefit for having this information in MSATS Vector recommends it be removed.</p>															
<p>9.3.4.(e) Populate the Change Request with the following information for each meter:</p>	<p>Editorial: Table has items in multiple times;</p> <table border="1" data-bbox="784 1053 1288 1220"> <tbody> <tr> <td>Current Transformer Type</td> <td>Current Transformer Ratio</td> <td>Current Transformer Accuracy Class</td> </tr> <tr> <td>Current Transformer Test</td> <td>Current Transformer Sample Family ID</td> <td>Current Transformer Test Date</td> </tr> <tr> <td>Voltage Transformer Location</td> <td>Voltage Transformer Type</td> <td>Voltage Transformer Ratio</td> </tr> <tr> <td>Voltage Transformer Accuracy Class</td> <td>Voltage Transformer Test</td> <td>Voltage Transformer Sample Family ID</td> </tr> <tr> <td>Voltage Transformer Sample Family ID</td> <td></td> <td></td> </tr> </tbody> </table>	Current Transformer Type	Current Transformer Ratio	Current Transformer Accuracy Class	Current Transformer Test	Current Transformer Sample Family ID	Current Transformer Test Date	Voltage Transformer Location	Voltage Transformer Type	Voltage Transformer Ratio	Voltage Transformer Accuracy Class	Voltage Transformer Test	Voltage Transformer Sample Family ID	Voltage Transformer Sample Family ID		
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<p>Table 16-C – NMI Standing Data Items and NMI Discovery Data Access Rules</p>	<p>The definition of the field needs to be clear. This is because a meter may have its own isolation device but could still be part of a shared fuse arrangement. Recommend the definition read:</p>															

Section No/Field Name	Participant Comments
Shared Fuse Point Flag	'A flag to indicate whether the metering installation has a shared fuse can be isolated independently without affecting any other Metering Installations. Valid values are I (can be isolated independently), S (shared fuse) or U, e.g. "S" indicates that the meter can only be isolated via a shared fuse.

5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments
<p>Table 3 CATS_METER_REGISTER</p> <p>CurrentTransformerTest</p> <p>VoltageTransformerTest</p>	<p>Type of test performed on metering installation with Current Transformer which can be one of the following:</p> <ul style="list-style-type: none"> • Tested (definition – part of 100% testing) • Sample Tested (definition – tested as part of a sample plan) • Sample (definition – part of an approved sample plan) <p>As it is permissible to either physically test a transformer or undertake a sample testing approach (subject to the approved test plan) and the rules do not interpret the results of either method any differently i.e. if the family passes or fails then it is that same as the device being physically tested. MC's are required to resolve any malfunction (or accuracy failure) within the mandated timeframes and if they are unable to do so, will apply for an exemption from AEMO which will update the exemption information in MSATS. It is unclear how having the method for determining the accuracy of the transformer in MSATS is of any benefit.</p> <p>It is also unclear what the differences is between Sample Tested and Tested, or Sample Tested and Sample (does this mean it wasn't physically tested?). This should be clarified.</p>
<p>Table 3 CATS_METER_REGISTER</p> <p>GPSCoordinatesLat</p> <p>GPSCoordinatesLong</p>	<p>Definition on storing GPS locations should be more explicit as there are several standards for recording Lat and Long. Below is a exert from the B2B OWN procedure. Recommend this description be used. The field also need to support sign.</p>

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<p>Table 3 CATS_METER_REGISTER</p> <p>ReadTypeCode</p>	<p>o D - Metering installation de-energised, cannot convert to 5-minute</p> <p>Do not support this value. If a meter is not able to be reconfigured to a new interval e.g. 5 min then it will stay at the current interval e.g. 30 min. This should not be used to indicate energisation status. If a meter is deenergised for a period of time MP's still have an obligation under the rules to reconfigure these once they come back on line. Having a 'D' status is redundant.</p>																

6. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments