

MSATS Standing Data Review

- MSDR Issues Paper
- Standing Data for MSATS Guideline

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Ausgrid

Completion Date: 31 March 2020.

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 14
- 4. Other Issues Related to Consultation Subject Matter 15

1. Context

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

2. Questions raised in the MSATS Standing Data Review Issues Paper

2.1 Metering Installation Information

Information Category	Question No.	Question	Participant Comments
General Metering Installation Information	1.	Do you support the addition of the Meter Malfunction Exemption Number field to MSATS? If not, why not?	<p>Ausgrid supports the addition of the Meter Malfunction exemption number. However we would like to highlight a few points.</p> <p>The exemption number does not identify what is wrong with the metering installation (eg. CT/VT failure, Meter family failure), so any incoming participant would not know what they are going into if winning a site. This information could also be counter productive to the customer if they wish to switch providers and the provider does not want to take on a site with a malfunction.</p> <p>If the exemption number was supplied, we believe AEMO would be best placed to populate and maintain the field and the MC will have to apply for an exemption. Having the MC</p>

Information Category	Question No.	Question	Participant Comments
			populate would be double handling and inefficient.
	2.	Do you support the addition of the Meter Malfunction Exemption Expiry Date field to MSATS? If not, why not?	As above.
	3.	If you do not support the addition of the suggested fields, do you support the addition of the Meter Family Failure field?	<p>Ausgrid assumes this field is for incoming parties, as the current FRMP would already be notified via a MFIN that it is a MFF.</p> <p>Ausgrid assumes the LNSP would be responsible for populating this field. Who will be responsible for updating (removing) the field once the MFF meter has been replaced? Ausgrid believe it should be the MPB who replaced the metering.</p>
	4.	If you do not support the amendments proposed by AEMO, which ones and why?	<p>Ausgrid supports the fields AEMO are proposing to amend.</p> <p>If Meter Model and Meter Manufactures will be an enumerated list, Ausgrid would require "Unknown" to be included in the enumerated list.</p>

Information Category	Question No.	Question	Participant Comments
			<p>Meter Test result accuracy field/test date, what is to be populated where there is no last test date?</p> <p>Last test date is included in the document has been identified as being amended (to mandatory) and also removed.</p>
	5.	What enumerations can be made for the Meter Use codes that would be useful for the market?	<p>Ausgrid would support the following enumeration:</p> <ul style="list-style-type: none"> - Revenue - Check - Statistical - Information
	6.	There are several existing fields that AEMO proposes removing from MSATS Standing Data. Do you see any value in their retention for the market? If so, please outline it.	Ausgrid agrees with the fields AEMO are proposing to remove.
	7.	Meter Constant may be a relevant field for older equipment as it refers to intrinsic constraint of meter in Wh/pulse. Is there value to this field for the market and if so is there another field that the constant could be listed in?	Ausgrid does not believe this field is required, metering energy constants are applied in MDP systems to determine metering data.

Information Category	Question No.	Question	Participant Comments
	8.	A majority of workshop attendees did not support the inclusion of the aforementioned industry-proposed fields as they would not provide value to the market as a whole. Are any of them worth further consideration? If so, why and what value do they add to the market?	Agree, should not be included.
	9.	Do you have any other comments regarding the general Metering Installation Information fields?	No.
Metering Installation Transformer Information	10.	Do you agree to AEMO's proposal with regards to splitting transformer information into CT and VT?	<p>Ausgrid is not sure what additional benefit this will achieve, as this information should be captured by the MPB when installing and inspecting metering installation and stored in their systems.</p> <p>However if this is made a requirement, NMI's with a classification of Wholesale metering points (or under 5MS, bulk, xboundary, interconnector) should be exempt from providing this information as these sites will not churn.</p>
	11.	Do you agree to AEMO's proposal with regards to adding new transformer information fields which includes: CT/VT Accuracy Class, CT/VT Last Test Date?	<p>Ausgrid is not sure what benefit the accuracy class field achieves. Last test date would be useful for incoming parties, however this could lead to parties discriminating against customers if they know a CT/VT test is due.</p> <p>NMI's with a classification of Wholesale metering points (or under 5MS, bulk,</p>

Information Category	Question No.	Question	Participant Comments
			xboundary, interconnector) should be exempt from providing this information as these sites will not churn.
	12.	Do you agree with the validations proposed by AEMO for the transformer information fields? If not, please provide other types of validations that can be applied.	NMIs with a classification of Wholesale metering points (or under 5MS, bulk, xboundary, interconnector) should be exempt from providing this information as these sites will not churn.
	13.	Do you agree to not to add CT/VT serial number fields, and if you do not agree, can you propose solutions for adding those fields in (i.e. new NMI devices table) and will adding them provide more benefit than costs to your business and customers	Agree, this should be captured by the MPB when installing and inspecting metering installation and stored in their systems.
Register Level Information	14.	Do you agree with amending the fields Controlled Load and Time of Day to include enumerated list of values? If Yes, what values can be in the enumerated list for the fields: <ul style="list-style-type: none"> - Controlled Load - Time of Day 	Agree. Controlled load – No, CL1, CL2, Other The Network tariff code can also be used to determine if controlled load is allocated to the register.
	15.	Do you agree with AEMO's proposal to remove the following fields? <ul style="list-style-type: none"> - Demand1 	Agree.

Information Category	Question No.	Question	Participant Comments
		<ul style="list-style-type: none"> - Demand2 - Network Additional Information 	
Connection and Metering point Details	16.	Do you agree with the proposal to include the Connection Configuration field as described above? Why/why not?	<p>No, this information can be derived from other fields, such as meter make and model, number of meters and associated network tariffs.</p> <p>There would be difficulty in determining if a site has 2 or 3 phases. Installations in Ausgrid's network contain the following problematic examples:</p> <ul style="list-style-type: none"> • Poly phase metering, 2 and 3 phase meters, and these are not identified as which is 2 or 3 phase; • Site that have 2 phases with a single phase meter on each phase (one phase Domestic tariff, other phase CL tariff).
	17.	Are there any connection configurations that could not be contained in the above Connection Configuration field?	No.
Shared Isolation Points Flag Field	18.	Are the values sufficient? What additional information should be provided, and how could it be validated?	Yes, guidelines need to be developed in the use and maintenance of this field. If a site is 'Unknown' or 'Yes', and a meter is exchanged and shared fuse removed (for that particular NMI), the MPB should update this field to 'No'.

Information Category	Question No.	Question	Participant Comments
	19.	Should "Unknown" be able to be changed into "Yes" / "No"?	Yes, and 'Yes'/'No' to 'unknown' if it is incorrectly populated.
Metering Installation Location Information	20.	Do you support the deletion of Additional Site Information?	Yes.
	21.	Are there any pieces of information that would be useful to explicitly flag for inclusion in the Meter Location field? (these can be included in the definition of the field)	Where the metering is not located in an obvious position.
	22.	Does your organisation support the mandatory provision of GPS coordinates for all rural sites?	Yes, but should be a required field not mandatory. Ausgrid currently store GPS coordinates for sites, however this is normally 10 metres into the property from the point of common coupling.
	23.	If the provision of GPS coordinates for all rural NMIs were made mandatory, does your organisation support the use of "Designated regional area postcodes" to define "rural"? If not, what alternative would your organisation prefer?	No - Postcodes cannot be used to determine whether a sites is rural and most post codes will contain both rural and non rural installations. Using this post code would require country town to include GPS coordinates which is not the intent. The definition of rural areas is determined by the council zoning determination. Ausgrid connection policy define rural as:

Information Category	Question No.	Question	Participant Comments
			<ul style="list-style-type: none"> An area zoned as rural under a local environment plan made under the Environmental Planning and Assessment Act 1979 (NSW).
	24.	Does your organisation support the mandatory provision of GPS coordinates for any sites with an MRIM meter?	<p>Ausgrid believes this should be a required field not mandatory. If AEMO make this mandatory there should be an analysis conducted on the cost/benefit.</p> <p>Why is MRAM and BASIC meters not included under this requirement?</p>
	25.	Does your organisation support the mandatory provision of GPS coordinates for any new installations?	Yes, if they can be captured then they should be. This should be a required field only.
	26.	Does your organisation believe that the provision of this information should be made mandatory for any other scenarios?	<p>Not mandatory only required.</p> <p>How are GPS coordinates going to be captured where the coordinates cannot be obtained? (eg. basements or meter located inside).</p>
	27.	Does your organisation believe that the provision of this information should be made required for any other scenarios?	Not mandatory only required.
	28.	Bearing in mind that GPS coordinates to four decimal places allow identification to the nearest 10 metres, that GPS coordinates to five decimal places allows identification to the	Ausgrid current GIS supports GPS coordinates to 6 decimal places.

Information Category	Question No.	Question	Participant Comments
		nearest metre, and that GPS coordinates to six decimal places allows identification to the nearest 10 centimetres, if the field is added should it be to four, five, or six decimal places?	
Meter Read and Estimation Information	29.	Do you agree with AEMO's proposal to amend or remove the meter read and estimation information as per the proposal above, if not please specify which ones you do not agree with and why?	Ausgrid agrees with both proposals: <ul style="list-style-type: none"> • making the NSRD a required field for manually read meters and • removing the estimation fields.
Meter Communications Information	30.	Do you agree with AEMO's proposal to remove the meter communications information fields as per the proposal above, if not please specify which ones you do not agree with and why?	Yes.

2.2 NMI details

Information Category	Question No.	Question	Participant Comments
Address Structure	31.	Do you agree with the proposal to remove unstructured address fields, following a period for data holders to clean their existing data?	Yes.

Information Category	Question No.	Question	Participant Comments
	32.	Are there any reasons to keep the Unstructured Address fields, given that additional locational information (e.g. “pump by the dam”) can be provided in other fields, e.g. Location Descriptor where we have proposed to lengthen the characters available?	No, this information can be provided in meter location.
	33.	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated by AEMO on the basis of structured address (as is currently done for DPIDs) and thereafter by LNSPs?	<p>Ausgrid would like to highlight that at the standing data workshop, it was identified that there was going to be further work and analysis completed on the viability and cost benefit of including this field.</p> <p>G-NAF is not always available when creating NMI standing data for new sites, it may be some time before this data is made available. In addition, the maintenance of these fields is limited to how often the GNAF database is updated.</p> <p>Ausgrid notes that one of the G-NAF limitations is that G-NAF supports the delivery address and not the site address.</p>
	34.	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated entirely by LNSPs?	As above.

Information Category	Question No.	Question	Participant Comments
	35.	If AEMO were to add the G-NAF PID field (which would uniquely identify a physical address), do participants believe there is use in keeping the DPID field?	As above. The DPID should remain, until analysis has been conducted on the use of GNAF.
	36.	Would your organisation support adding Section Number and DP Number if G-NAF PID were also to be added?	No, structured addresses have proven in the past to alleviate site identification issues. See above comments on GNAF.
	37.	Would your organisation support adding Section Number and DP Number if G-NAF PID were not to be added?	No, structured addresses have proven in the past to alleviate site identification issues.
Feeder Class	38.	Do you agree with the proposal to make Feeder Class required for the jurisdiction of Queensland?	No Comment
Transmission Node Identifier2	39.	Do you agree with the proposal to introduce TNI2?	Agree.

2.3 NER Schedule 7.1

Information Category	Question No.	Question	Participant Comments
NER Schedule 7.1 Rule Change	40.	Do you see any benefit in Schedule 7.1 remaining as-is? If so, please detail the benefit.	No.
	41.	Do you support AEMO's proposal? If you do not, please detail why.	Ausgrid agrees with AEMO's proposal.
Fields referenced in the NER that are not implemented in MSATS	42.	Do you see any benefit in adding the aforementioned fields to MSATS? If so, in which table would you propose they be added and how can the quality of data be ensured?	No.

3. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments

Section No/Field Name	Participant Comments

4. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments

Heading	Participant Comments