MSATS Standing Data Review
- ## MSDR Issues Paper
- ## Standing Data for MSATS Guideline

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services

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Table of Contents

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?	AusNet Services supports the addition of the MeterMalfunctionExemptionNumber field provided the field is 'Required'.
	2.	Do you support the addition of the Meter Malfunction Exemption Expiry Date field to MSATS? If not, why not?	AusNet Services supports the addition of the MeterMalfunctionExemptionExpiryDate field provided the field is 'Required'.
	3.	If you do not support the addition of the suggested fields, do you support the addition of the Meter Family Failure field?	No comment.
	4.	If you do not support the amendments proposed by AEMO, which ones and why?	AusNet Services does not support the following amendments proposed by AEMO. - The field 'LastTestDate' amended from being 'Optional' to 'Required'. There is no defined benefit in providing this information in Victoria where the MPB = MC = LNSP. All AusNet Services VICAMI meters meet the minimum Victorian specifications and cannot be re-purposed to act as a type 4

Information Category	Question No.	Question	Participant Comments
			contestable meter under requirements that currently apply in other jurisdictions. Therefore, there is no benefit or value in making this field "required" in Victoria. - The field 'Use' amended description and corresponding enumerated list. There is no defined benefit in providing this information in Victoria where the MPB = MC = LNSP.
	5.	What enumerations can be made for the Meter Use codes that would be useful for the market?	No comment.
	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.	AusNet Services supports the removal of the following fields. - AdditionalSiteInformation - AssetManagementPlan - CalibrationTables - CommunicationEquipmentType - CommunicationsProtocol - DataConversion - DataValidations - EstimationInstructions - MeasurementType - Constant - Point - Program - Route

Information Category	Question No.	Question	Participant Comments
			- NextTestDate - Password - RemotePhoneNumber - TestCalibrationProgram - TestPerformedBy - TestResultAccuracy - TestResultNotes - TransformerLocation - TransformerRatio - TransformerType - UserAccessRights - DeliveryPointIdentifier - AddressLine - NetworkAdditionalInformation - Demand1 - Demand2
	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?	AusNet Services does not see any value in retaining the Meter Constant field. The older equipment is no longer used for revenue metering, and inadvertent population of this field can only confuse billing and metering staff.
	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?	AusNet Services agrees with the majority of attendees and does not support the inclusion of the following fields. - Disconnection Method - Meter Commission Date

Information Category	Question No.	Question	Participant Comments
			- Meter Locks - Minimum Interval Length - Meter Family Failure - Meter Test Report - Plug-in Meter Flag
	9.	Do you have any other comments regarding the general Metering Installation Information fields?	No comment.
Metering Installation Transformer Information	10.	Do you agree to AEMO's proposal with regards to splitting transformer information into CT and VT?	AusNet Services does not oppose AEMO's proposal to splitting transformer information into CT and VT per say, however, we do object to the proposal to make these fields 'Required'. This information is of no benefit in Victoria for small customer metering where the MPB = MC = LNSP. Additionally, we question whether contestable MPBs will be reliably populating VT information given many VTs are installed by and owned by the LNSP.
	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?	As per AusNet Services response to Question 10.
	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.	As per AusNet Services response to Question 10. Additionally the enumerated list for CT/VT Type should be "single phase, multi phase". As some connections have two phases connected.
	13.	Do you agree with AEMO's proposal not to add CT/VT serial number fields, and if you do not agree with AEMO's proposal, can you propose solutions for adding those fields in (i.e. new NMI devices	AusNet Services supports AEMO's proposal to not add CT/VT Serial Numbers. Transformer serial numbers would be completely irrelevant to the market.

Information Category	Question No.	Question	Participant Comments
		table) and will adding them provide more benefit than costs to your business and customers	
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: - Controlled Load - Time of Day	AusNet Services does not support the following amendments proposed by AEMO. - The field 'ControlledLoad' amended from being free text to an enumerated list. There is no defined benefit in providing this information in Victoria where the MPB = LNSP. - The field 'TimeofDay' amended from being free text to an enumerated list. There is no defined benefit in providing this information in Victoria where the MPB = MC = LNSP.
	15.	Do you agree with AEMO's proposal to remove the following fields? - Demand1 - Demand2 - Network Additional Information	AusNet Services supports the removal of the following fields. - Demand1 - Demand2 - NetworkAdditionalInformation
Connection and Metering point Details	16.	Do you agree with the proposal to include the Connection Configuration field as described above? Why/why not?	AusNet Services does not support the inclusion of the Connection Configuration field. The information is either already known by the parties who need to know it (including the customer) or can be easily inferred by other standing data fields. However, if this field is to be included, AusNet Services proposes that the data within the field only becomes 'Required' for new meter installs as of May 2022 onwards.

Information Category	Question No.	Question	Participant Comments
	17.	Are there any connection configurations that could not be contained in the above Connection Configuration field?	AusNet Services believes that 'SWER' – Single Wire Earth Return might not be able to be contained in the Connection Configuration field and nor should it be contained in an MSATS field. It is only relevant to the customer when the customer is negotiating an alteration to their connection point with the Distribution Network Service Provider.
Shared Isolation Points Flag Field	18.	Are the values sufficient? What additional information should be provided, and how could it be validated?	AusNet Services proposes to include 'Unknown' as an additional value in this field, as per the Issue Paper. The Issues Paper stated that "Unknown" would be a suitable value for this field as the AEMC has no expectation that the LNSP perform field visits to obtain this information proactively, however in Table 4 CATS_METER_REGISTER - Browser cross reference the Browser Format only stipulates 'CHAR(2)'. This table needs to be updated to reflect the advice provided by the AEMC.
	19.	Should "Unknown" be able to be changed into "Yes" / "No"?	As the new 'SharedFuse' field is Mandatory, the use of "Unknown" will be used as the default position for the LNSP until a site visit occurs and a shared fuse scenario can be confirmed. Parties should not be required to guess whether a shared fuse is present when a site inspection is required to identify shared fusing.

Where a site is flagged as "Unknown" the LNSP or metering provider should be able update the field to "Yes" / "No". The LNSP or metering provider should be permitted to update related standing data without updating the status of the "shared isolation points flag field." That is, validation should not preclude the |

Information Category	Question No.	Question	Participant Comments
			population of Unknown. Not all updates to standing data occur after a site visit.
Metering Installation Location Information	20.	Do you support the deletion of Additional Site Information?	AusNet Services supports the deletion of the Additional Site Information field.
	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)	AusNet Services has not identified any additional information required to be included in the Meter Location field definition.
	22.	Does your organisation support the mandatory provision of GPS coordinates for all rural sites?	AusNet Services does not support the mandatory provision of GPS coordinates for rural sites in Victoria where the MPB = MC = LNSP, where metering contestability is not permitted under electricity law.

Aside from adding no benefit in Victoria. The cost associated with providing this information is extremely high for an MPB. Has a cost benefit analysis been conducted by AEMO for this field to be included into the Consultation? Why can't the customer self-identify their google maps coordinates to the retailer coordinating the meter change? Surely this is cheaper than the cost of a site visit to every meter in rural area and causes less distress to customers than seeing a MPB or DNSP staff member at their meter box. Once a remotely read meter is installed customers generally expect it to be left alone, unless it fails. AEMO is surely not prepared to answer phone calls from customers asking why there a metering staff member at their meter box. |

Information Category	Question No.	Question	Participant Comments
			AusNet Services proposes this field be removed from the Consultation and a separate ICF be raised by the proponent of this change.
	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?	As per AusNet Services response to Question 22.
	24.	Does your organisation support the mandatory provision of GPS coordinates for any sites with an MRIM meter?	As per AusNet Services response to Question 22.
	25.	Does your organisation support the mandatory provision of GPS coordinates for any new installations?	As per AusNet Services response to Question 22.
	26.	Does your organisation believe that the provision of this information should be made 'Mandatory' for any other scenarios?	As per AusNet Services response to Question 22.
	27.	Does your organisation believe that the provision of this information should be made 'Required' for any other scenarios?	AusNet Services does not support that the provision of GPS information should be made 'Required' for any other scenarios in Victoria where the MPB = MC = LNSP.
	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 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?	No comment.

Information Category	Question No.	Question	Participant Comments
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?	AusNet Services supports the amendment to make the 'NextScheduledReadDate' a 'Required' field. AusNet Services also supports the removal of the following fields. - DataValidations - EstimationInstructions - MeasurementType
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?	AusNet Services supports the removal of the following fields. - CommunicationEquipmentType - CommunicationsProtocol - DataConversion - Password - RemotePhoneNumber - UserAccessRights

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?	AusNet Services supports the removal of the following fields provided a sufficient transition period will be provided to LNSPs to perform data cleansing activities. - AddressLine (line 1-3)
	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?	AusNet Services believes there are no reasons to keep the Unstructured Address fields.
	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?	AusNet Services does not support the inclusion of the G-NAF PID field. The G-NAF data is updated too infrequently (only updated quarterly in Feb, May, August and November) to be included as a data set, especially for NMI Creation (CRC 20XX) for New Connections. Sometimes even services like LandVic are not updated frequently enough and networks are needing to refer online planning permit processes to undertake connections. If the G-NAF PID field is made Mandatory, as indicated in the Standing Data for MSATS document released with the Stage 1 Consultation, then the LNSP will not be able to create a NMI without this dataset and may stall the NMI creation process, especially for new sub divisions/estates. Customer advocates are already critical of delays in connections for new developments caused by LandVic not being up to date. The effect of

Information Category	Question No.	Question	Participant Comments
			implementing this change would be to delay connection processes. Consumer advocates and government authorities would not be pleased with this outcome.
			Additionally, the G-NAF data that has been made openly available is the raw G-NAF data which is a complex database consisting of more than 30 tables of data. That makes it difficult to use without considerable manipulation.
			Further information can be found in the following link.
			https://data.gov.au/data/dataset/19432f89-dc3a-4ef3-b943-5326ef1dbecc
			The provision of this information requires further cost-benefit analysis outside of the MSATS Standing Data Review. AusNet Services proposes this field be removed from the Consultation and a separate ICF be raised by the proponent of this change. Additionally, recommendations made from customer advocates to government authorities on this matter have been shared with the AER. It may be appropriate for AEMO to understand these recommendations on strictly confidential basis.
	34.	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated entirely by LNSPs?	As per AusNet Services response to Question 33.

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?	AusNet Services does not support the inclusion of the DeliveryPointIdentifier field or the G-NAF PID fields.
	36.	Would your organisation support adding Section Number and DP Number if G-NAF PID were also to be added?	AusNet Services supports the introduction of Section Number and DP Number for the NSW Jurisdiction, it does not support the introduction of these fields for the VIC Jurisdiction even if the G-NAF PID was not added.
	37.	Would your organisation support adding Section Number and DP Number if G-NAF PID were not to be added?	AusNet Services believes, as per the pre-consultation workshop that Section Number and DP were only required for the NSW Jurisdiction. AusNet Services does not support the inclusion of Section Number and DP Number for the VIC Jurisdiction nor the inclusion of the G-NAF PID as per our response to Question 33.
Feeder Class	38.	Do you agree with the proposal to make Feeder Class required for the jurisdiction of Queensland?	AusNet Services supports making Feeder Class 'Required' for the QLD Jurisdiction only.
Transmission Node Identifier2	39.	Do you agree with the proposal to introduce TNI2?	AusNet Services supports the inclusion of the TNI2 field provided AEMO populates this information ongoing.

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.	AusNet Services does not see any benefit in retaining Schedule 7.1 in the NER.
	41.	Do you support AEMO's proposal? If you do not, please detail why.	AusNet Services supports AEMO's proposal to remove Schedule 7.1 within the NER.
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?	AusNet Services does not see any benefit in adding the following data fields to MSATS. - Loss compensation calculation details - Data register coding details - 'Write' password (to be contained in a hidden or protected field) Publishing the write password in a system that provides the data to any retailer nominated metering provider, especially if they were transferred in error, would be a breach of security controls. AEMO would need to indemnify metering parties from losses in these circumstances.

3. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments
Table 4 CATS_METER_REGISTER – Browser cross reference • Current Transformer Location • Current Transformer Type • Current Transformer Ratio • Current Transformer Accuracy Class • Voltage Transformer Location • Voltage Transformer Type • Voltage Transformer Ratio • Voltage Transformer Accuracy Class	The format of these fields is listed as 'VARCHAR' in the Browser cross reference table when all other of the same format type are 'VARCHAR2', should these also be 'VARCHAR2'?
Table 5 CATS_METER_REGISTER – Examples • Estimation Instructions • Point	These fields have been marked as 'Removed', the corresponding examples need to be removed from Table 5 CATS_METER_REGISTER - Examples
Table 3 CATS_METER_REGISTER – Field definitions **Table 4 CATS_METER_REGISTER – Browser cross reference** **Table 5 CATS_METER_REGISTER – Examples**	As per Section 3.1.6 of the Issues Paper, AEMO has proposed to remove this field therefore this field should be removed from all relevant tables.

Section No/Field Name	Participant Comments
• Measurement Type	
Table 3 CATS_METER_REGISTER – Field definitions • Manufacturer • Model	As per Section 3.1.1 of the Issue Paper, AEMO has proposed these field will require enumerated lists, therefore they are longer free text. The description for these field requires updating to align to the proposed approach.
Table 4 CATS_METER_REGISTER – Browser cross reference • Shared Fuse	As per Section 3.1.4 of the Issues Paper "the AEMC does not expect that LNSPs proactively inspect sites to gather this information, and as such, AEMO proposes that this field be populated with the values of "Yes", "No", and "Unknown"." However, the format stipulated in Table 4 only stipulates CHAR(2). The format requires updating to cater for AEMO's proposal to include "Unknown".

4. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Revert RegisterID definition in Standing Data for MSATS.	AusNet Services have submitted ICF to the ERCF requesting to revert the description of the RegisterID field in the Standing Data for MSATS procedure from 5MS Work Package 3 version 5.0 to the Current version 4.4 as version 5.0 introduced the requirement for the RegisterID to align to the NMI Suffix which creates additional work for the LNSP on top of 5MS and is not necessary for the 5MS program of work.