MSATS Standing Data Review

- MSDR Issues Paper
- Standing Data for MSATS Guideline

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant**: Endeavour Energy*

***Completion Date**: 31/03/2020*

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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?	Yes, we support adding the Meter Malfunction Exemption Number. This will allow for better visibility of exemptions granted to meter malfunctions and if more information is required then this exemption number can be quoted in communication with the retailer and metering service providers.
	2.	Do you support the addition of the Meter Malfunction Exemption Expiry Date field to MSATS? If not, why not?	Yes, we support adding the Meter Malfunction Exemption Expiry Date. This will allow for better visibility of when the meter malfunction is likely to be rectified.
	3.	If you do not support the addition of the suggested fields, do you support the addition of the Meter Family Failure field?	Yes, we support the addition of a field that indicates a meter family failure. However, we suggest that this field be expanded to cover all metering installation malfunction scenarios – see our comments below suggesting a new field called Metering Installation Malfunction.

Information Category	Question No.	Question	Participant Comments
	4.	If you do not support the amendments proposed by AEMO, which ones and why?	We believe that if the Meter Test Result Accuracy field was to be adopted then the Last Test Date field is not required because it is redundant.
	5.	What enumerations can be made for the Meter Use codes that would be useful for the market?	We agree with the suggested enumeration values define in table 30. However, we disagree that these values should be captured in this document. For the purpose of the consultation, we suggest that the values be captured in the consultation paper and when the solution is implemented we suggest that the values be captured and maintained in MSATS. See our comments on 'enumerated values to be easily modified' below for more detail.
	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. - 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?	We agree with the suggested fields to be removed. We do not believe that these fields provide value to any other party except for the metering service provider, therefore they are not required in MSATS - this includes the Meter Constant field.
	7.	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	We believe that AEMO should consider adopting the field called Meter Commission Date.

Information Category	Question No.	Question	Participant Comments
		worth further consideration? If so, why and what value do they add to the market?	From our experience there are many instances where a meter is installed at a site and is not populated in MSATS for over 6 months, at which point MSATS will not accept a start date that aligns with the commissioning date (due to the 140 business day limit of the CR3001) We believe that including this new field will allow for metering providers to communicate the meter commissioning date, without the 140 business day retrospective constraint, and therefore communicate when to expect metering data from.
	8.	Do you have any other comments regarding the general Metering Installation Information fields?	Yes, please see below our comments on 'New fields for non-contestable unmetered loads', 'Network Tariff Code' and 'Separate metering installation fields from metering fields'
Metering Installation Transformer Information	9.	Do you agree to AEMO's proposal with regards to splitting transformer information into CT and VT?	Yes, we agree with the splitting of transformer information into CT and VT. This would allow for better communication of these metering installation equipment.
	10.	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?	Yes, we agree with adding new transformer information fields. However, we wish to suggest the following: CurrentTransformerType: - this should be the type of CT. This field should be an enumerated

Information Category	Question No.	Question	Participant Comments
			field, which should include the following values: A, B, C, S, T, U, V and W CurrentTransformerRatio: This should be made clearer that the ratio is the connected ratio, as opposed to the available ratio. This field should be an enumerated field, which should include the following values: 150:5 200:5 300:5 400:5 600:5 800:5 1000:5 1200:5 1500:5 2000:5 3000:5 4000:5 CurrentTransformerAccuracyClass: This field should be an enumerated field, which should

<table>
<tr><th>Information Category</th><th>Question No.</th><th>Question</th><th>Participant Comments</th></tr>
<tr><td></td><td></td><td></td><td>include the following values: 0.1, 0.2, 0.5, 3, 5, 0.1S, 0.2S and 0.5S

VT Primary and Secondary Voltages: We suggest that this new field be added as it would help an incoming metering provider to better understand the metering installation and therefore better prepare for the initial site visit. This field should be an enumerated field, which should include the following values: 132KV / 110v, 66KV / 110v, 33KV / 110v, 11KV / 110v</td></tr>
<tr><td></td><td>11.</td><td>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.</td><td>We wish to suggest the following additional validations:
All the CT information fields are mandatory when the ConnectionConfiguration indicates that there are CTs
All the VT information fields are mandatory when the ConnectionConfiguration indicates that there are VTs
The value in CurrentTransformerRatio is appropriate for the CurrentTransformerType. See below:
<table><tr><td>CT Type</td><td>CT Ratio</td></tr><tr><td>A</td><td>150 / 300 / 600 : 5</td></tr><tr><td>B</td><td>400 / 800 / 1200 : 5</td></tr></table></td></tr>
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<tr><th>Information Category</th><th>Question No.</th><th>Question</th><th>Participant Comments</th></tr>
<tr><td></td><td></td><td></td><td>
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<tr><td>C</td><td>1000 / 2000 / 3000 : 5</td></tr>
<tr><td>S</td><td>200 : 5</td></tr>
<tr><td>T</td><td>800 : 5</td></tr>
<tr><td>U</td><td>2000 : 5</td></tr>
<tr><td>V</td><td>4000 : 5</td></tr>
<tr><td>W</td><td>1500 : 5</td></tr>
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</td></tr>
<tr><td></td><td>12.</td><td>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</td><td>We agree with AEMO to not add CT/VT serial number fields. We believe that it is sufficient for a metering service provider to identify a metering installation by referring to the site address and the meter serial number.</td></tr>
<tr><td>Register Level Information</td><td>13.</td><td>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</td><td>We agree with AEMO to change the Controlled Load and Time of Day fields to enumerated fields.

We suggest that the Controlled Load field should include the values of ‘No’, ‘CL1’ and ‘CL2’. These values are required to support the scenario where the metering provider provides controlled load functionality via their meter. In this scenario the metering provider is responsible for configuring the meter for a particular controlled load setting and therefore needs to communicate this setting.

In addition to a value of ‘ALLDAY’, we suggest that the Time of Day field should also include the values of ‘PEAK’, ‘SHOULDER’ and ‘OFFPEAK’. These values are required to</td></tr>
</table>

Information Category	Question No.	Question	Participant Comments
			support an accumulation meter with time of use capability. We note that currently the values expected for the Time of Day field for an interval meter is "INTERVAL'. For consistency we suggest that the value of 'INTERVAL' not be included as an enumerated value and that 'ALLDAY', if applicable, be used instead for an interval meter. We believe that the information for the Controlled Load and Time of Day are mutually exclusive, that is if the register is not measuring controlled load then it must be measuring something else as described in the time of day field. Therefore for consideration, the Controlled Load field could be eliminated and the enumerated values for this field be included in the Time of Day field, except for the value of 'No'.
	14.	Do you agree with AEMO's proposal to remove the following fields? - Demand1 - Demand2 - Network Additional Information	We agree with the suggested fields to be removed. We note that these fields are network tariff related fields, with the demand fields rarely used and the additional information field only used to provide the name of the network tariff code.

Information Category	Question No.	Question	Participant Comments
Connection and Metering point Details	15.	Do you agree with the proposal to include the Connection Configuration field as described above? Why/why not?	We agree with adding the Connection Configuration field as it provides key information about the metering installation. It should be made clearer that the code for the 'Phases in Use' field is at the metering installation level and not the meter level. We suggest that the Connection Configuration field be captured at a metering installation level and not at the meter level, therefore this field should not be part of the meter-register table. See our feedback on 'separate metering installation fields from metering fields' below for more detail.
	16.	Are there any connection configurations that could not be contained in the above Connection Configuration field?	No, we believe that all metering installations can be described by this new Connection Configuration field.
Shared Isolation Points Flag Field	17.	Are the values sufficient? What additional information should be provided, and how could it be validated?	Yes, we believe that the 3 proposed values are sufficient.
	18.	Should "Unknown" be able to be changed into "Yes" / "No"?	Yes, we believe that the value should be allowed to change to any other allowable value including from 'unknown' to either 'yes' or 'no.
Metering Installation Location Information	19.	Do you support the deletion of Additional Site Information?	Yes, we agree that the Additional Site Information field can be deleted after extending the number of characters for the Meter Location field from 50 to 200 and moving any existing

Information Category	Question No.	Question	Participant Comments
			data from the Additional Site Information field to the Meter Location field.
	20.	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)	No, we believe that it is sufficient to define the Meter Location field to be a free text field used to describe the location of the meter or how to access the meter.
	21.	Does your organisation support the mandatory provision of GPS coordinates for all rural sites?	We do not support adding GPS coordinates to MSATS because the cost to collect and provide this information outweighs the benefit, especially when there are other cost effective ways to locate the meter. If GPS coordinates were to be added to MSATS then the answer to the question is 'No'. For rural sites, it is very common for these premises to be connected via overhead mains and therefore it would not be difficult to locate the meter by following the overhead mains. For the small percentage where the overhead mains are converted to underground within the premises then it is not uncommon for the meter to be located on a physical structure, eg the house or the shed, therefore with the help of comments on the meter location the meter can be easily located.

Information Category	Question No.	Question	Participant Comments
	22.	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, if GPS coordinates were to be added to MSATS then we do not agree with the proposal to use designated regional area postcodes to define rural. This definition is too broad because the postcodes that are captured in this definition also captures urban premises.
	23.	Does your organisation support the mandatory provision of GPS coordinates for any sites with an MRIM meter?	No, if GPS coordinates were to be added to MSATS then this should not be mandatory for existing MRIM metering installations. It is not clear why GPS coordinates is suggested to be mandatory for an MRIM metering installations in contrast to other metering types. Without an explanation of the benefits or the use case for an MRIM metering installations we do not believe that the cost to collect and provide this information outweighs the benefit, especially when there are other cost effective ways to locate the meter.
	24.	Does your organisation support the mandatory provision of GPS coordinates for any new installations?	No, if GPS coordinates were to be added to MSATS then we believe for premises where the location of the meter is easily identifiable, eg residential sites, then adding GPS coordinates does not add any value. For sites where the meter is location is not easily identifiable, eg apartments, then comments about the meter location would be sufficient and at times could be better than GPS coordinates (eg meter located in basement – GPS coordinates would

Information Category	Question No.	Question	Participant Comments
			not be helpful but meter location comments would be helpful).
	25.	Does your organisation believe that the provision of this information should be made mandatory for any other scenarios?	No, if GPS coordinates were to be added to MSATS then GPS coordinates should not be mandatory for any scenario. We do not believe that the cost to collect and provide this information outweighs the benefit, especially when there are other cost-effective ways to locate the meter.
	26.	Does your organisation believe that the provision of this information should be made required for any other scenarios?	Yes, if GPS coordinates were to be added to MSATS then GPS coordinates should only be required for new metering installations and any changes to existing metering installations. We note that the B2B NOMW transaction already require GPS coordinates for new metering installation and any changes to existing metering installations. Therefore, we believe that by aligning to the B2B Procedure there would not any additional cost on participants.
	27.	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?	If GPS coordinates were to be added to MSATS then we suggest that it should be up to 7 decimal places. This aligns with the number of decimal places for the GPS coordinates defined in the B2B NOMW transaction.

Information Category	Question No.	Question	Participant Comments
Meter Read and Estimation Information	28.	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?	Yes, we agree with amending the Next Scheduled Read Date from 'Optional' to 'Required' for manually read meters and the removal of the 3 suggested fields. To determine if a meter is manually read we suggest that AEMO look at the first character of the Read Type Code field, as opposed to the Installation Type Code field, because some metering installations that is normally manually read can be remotely read. For example, under 7.8.9.b of the NER remote collection of metering data is allowed for type 5 and 6 metering installation.
Meter Communications Information	29.	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, we agree with the suggested fields to be removed. We do not believe that these fields provide value to any other party except for the metering service provider, therefore they are not required in MSATS

2.2 NMI details

Information Category	Question No.	Question	Participant Comments
Address Structure	30.	Do you agree with the proposal to remove unstructured address fields, following a period for data holders to clean their existing data?	Yes, we agree with the removal of the unstructured address fields. The use of structured addresses allows for better validation and management of this important information.
	31.	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, there is no reason to keep unstructured address fields. Our current process is to convert any valid unstructured addresses received via the Allocate NMI service order into structured addresses, therefore from our experience there is no scenario where an address cannot be entered as a structured address.
	32.	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?	No, we disagree with the proposal to add GNAF PID if the distributor is obligated to populate and maintain this field in MSATS. This is because it would require significant system changes however no use case has been put forward to explain how GNAF PID can be used to benefit the industry or the customer. Should retailers or AEMO believe that there are benefits of adding GNAF PID then we suggest that AEMO populates and maintain this field to minimise the collective cost to industry.
	33.	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated entirely by LNSPs?	No, we disagree with the proposal to add GNAF PID if the distributor is obligated to populate and

Information Category	Question No.	Question	Participant Comments
			maintain this field in MSATS. See our comments to question 32.
	34.	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?	Regardless of whether GNAF PID is added to MSATS or not, we suggest that DPID be removed because it does not provide any value to industry.
	35.	Would your organisation support adding Section Number and DP Number if G-NAF PID were also to be added?	Regardless of whether GNAF PID is added to MSATS or not, we suggest that Section Number and DP Number be added to MSATS. This is because from our experience it can take 6 months or longer for the GNAF PID to be issued for a site. From the time a NMI is populated in MSATS and when the GNAF PID is populated in MSATS, retailers could confirm a NMI by checking the Section Number and DP Number fields. Even when the GNAF PID is populated in MSATS, customers are more likely to know their Lot, Section Number and/or DP Number than the GNAF PID, therefore retailers could confirm a NMI by checking the Section Number and DP Number fields against the information provided to them by the customer. Also, should AEMO take on the responsibility to populate the GNAF PID then Section Number and DP Number is required to uniquely identify and link the GNAF PID to the right NMI.

Information Category	Question No.	Question	Participant Comments
	36.	Would your organisation support adding Section Number and DP Number if G-NAF PID were not to be added?	Regardless of whether GNAF PID is added to MSATS or not, we suggest that Section Number and DP Number be added to MSATS. See our comments to question 35.
Feeder Class	37.	Do you agree with the proposal to make Feeder Class required for the jurisdiction of Queensland?	Yes, we agree with making Feeder Class required for QLD but optional for other jurisdictions because this field is predominately only used in QLD.
Transmission Node Identifier2	38.	Do you agree with the proposal to introduce TNI2?	Yes, we agree with the proposal to add a TNI2 field because this will help AEMO to manage global settlements where there are cross boundary connection points.

2.3 NER Schedule 7.1

Information Category	Question No.	Question	Participant Comments
NER Schedule 7.1 Rule Change	39.	Do you see any benefit in Schedule 7.1 remaining as-is? If so, please detail the benefit.	No, we do not see any benefit of Schedule 7.1 remaining as is. The current approach of listing all the required fields is too prescriptive and therefore does afford enough flexibility to manage changes to accommodate industry changes.

Information Category	Question No.	Question	Participant Comments
	40.	Do you support AEMO's proposal? If you do not, please detail why.	Yes, we support AEMO's proposal in principle. We reserve our decision when we see AEMO's detailed proposal.
Fields referenced in the NER that are not implemented in MSATS	41.	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, we do not see any benefit of adding the 3 aforementioned fields. We do not believe that these fields provide value to any other party except for the metering service provider, therefore they are not required in MSATS.

3. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments
Enumerated values to be easily modified	We note that AEMO is proposing to have enumerated fields. We support this in principle as it will allow for higher quality data to be populated in MSATS. However, this must be supported with a solution that will allow for addition, deletion or modification of the enumerated values to be done quickly, and therefore should not have to be subjected to a procedure consultation or a schema change to make these changes. We note that some of the enumerated values are defined in the Standing Data for MSATS document which suggests that consultation is required if the enumerated values were to be added, deleted or modified. We suggest that a similar approach to Network Tariff Code be adopted whereby the enumerated values are not defined in a document but is instead maintained within MSATS.

Section No/Field Name	Participant Comments
Optional fields	We note that AEMO is proposing to remove or change, where possible, all the optional fields. However the fields Hazard, Location and Aggregate are still listed as optional. We suggest AEMO consider changing these fields to 'required'.

4. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
New fields for non-contestable unmetered loads	To support changes introduced by the 5MS program, we wish to suggest 3 new fields: Device Type, Device Profile, Device Agreed Load. These new fields should be required for non-contestable unmetered load NMIs where a 1 NMI to 1 device approach is adopted. More detail of these new fields are below:

<table>
<tr><th>Heading</th><th>Participant Comments</th></tr>
<tr><td></td><td>
<table>
<tr><th>Field Name</th><th>Description</th><th>Who should provide this data?</th></tr>
<tr><td>Device Type</td><td>This is applicable for non-contestable unmetered loads only. This is the type of device installed. This field should contain a list of allowable values such as telephone box, NBN cabinet, advertising sign etc</td><td>If this field was to be included in MSATS, then we believe that the LNSP should populate this field as it is related to non-contestable unmetered loads</td></tr>
<tr><td>Device Profile</td><td>This is applicable for non-contestable unmetered loads only. This is the profile used for calculating the metering data. This field should contain a list of allowable values such as all times, sun rise/set etc</td><td>If this field was to be included in MSATS, then we believe that the LNSP should populate this field as it is related to non-contestable unmetered loads</td></tr>
<tr><td>Device Agreed Load</td><td>This is applicable for non-contestable unmetered loads only. This is the agreed rating of the device in Watts</td><td>If this field was to be included in MSATS, then we believe that the LNSP should populate this field as it is related to non-contestable unmetered loads</td></tr>
</table>

We note that most these new fields are not applicable for most NMIs in MSATS. Therefore we suggest that they be designed in a similar manner to NSP2, whereby these fields are not associated with a NMI by default and only get associated with a NMI when they are populated.
</td></tr>
<tr><td>Network Tariff Code</td><td>The Network Tariff Code field is currently mandatory for a MPB to populate. We believe that this field should be the responsibility of the LNSP given the purpose of this field.

One option is to allow a MPB to create a meter register record without a Network Tariff Code. The LNSP will then be required to populate the Network Tariff Code. Any further changes to the meter register record by the MPB should always result in the Network Tariff Code being carried to the updated meter register record, that is the MPB cannot</td></tr>
</table>

Heading	Participant Comments
	change or blank out the Network Tariff Code. The LNSP should always have the right to change the Network Tariff Code. Another option is to remove the Network Tariff Code field from the meter register record and create two new fields in the NMI master record called 'Network Service' and 'Network Tariff Code'. The Network Service field describes the services offered by the network and should be an enumerated field with values like 'general supply' and 'off peak', and the Network Tariff Code is used to assign the network tariff code to the network service.
Separate metering installation fields from metering fields	Currently the MSATS data model is that for every NMI master record there can be 1 or more meter register record, and for every meter register record there can be 1 or more register identifier record. There are a number of fields that are more representative of a metering installation than a meter, therefore these fields should not be included as part of the meter record and instead should be separated out into the NMI master record or a new record type be created. This would avoid the need to duplicate the same data and avoid inconsistent data to be populated just because of the data model of MATS. We suggest that the option to create a new record type be adopted to better support the MPB being responsible for these metering installation records, while the LNSP continue to be responsible for the NMI master record. We suggest that the following fields be moved to this new metering installation record: ConnectionConfiguration CurrentTransformerLocation CurrentTransformerType CurrentTransformerRatio

Heading	Participant Comments
	CurrentTransformerAccuracyClass CurrentTransformerLastTestDate VoltageTransformerLocation VoltageTransformerType VoltageTransformerRatio VoltageTransformerAccuracyClass VoltageTransformerLastTestDate GPSCoordinates or GNAF PID, if these were to be included in MSATS Hazard Location NextScheduledReadDate SharedFuse Meter Malfunction Exemption Number Meter Malfunction Exemption Expiry Date Meter Installation Malfunction (a new field that we are suggesting)

Heading	Participant Comments
New field – Meter Installation Malfunction	To provide better visibility and performance reporting for resolving metering installation malfunctions we suggest a new field, called Metering Installation Malfunction, be added to MSATS. We suggest that this field be an enumerated field and include values already defined in the B2B Meter Fault and Issue Notification transaction. The NER defines actions and timeframes for the FRMP and MC when a metering installation malfunction is identified or notified of. We note that AEMO and AER are interested in this matter because we are regularly requested for information on our metering installation malfunctions including when we identified and notified of them. We believe that this new field, along with the other new fields of Meter Malfunction Exemption Number and Meter Malfunction Exemption Expiry Date, will provide end to end transparency on this matter. We believe that this transparency will encourage a better compliance culture and performance reporting. Unfortunately, the B2B transaction is unable to provide such transparency and why we are suggesting moving such information to MSATS. Should this suggestion be adopted then we will suggest changes to the B2B procedure to remove any duplication.