

## MSATS Standing Data Review

- MSDR Issues Paper
- Standing Data for MSATS Guideline

## CONSULTATION – First Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

*Participant: EnergyAustralia*

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# 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 ..... 14

## 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?	EnergyAustralia supports the addition of the Meter Malfunction Exemption Number, as the information will be useful to Metering Coordinators and retailers when assessing the action plan for metering at the site.
	2.	Do you support the addition of the Meter Malfunction Exemption Expiry Date field to MSATS? If not, why not?	EnergyAustralia supports the addition of the Meter Malfunction Exemption Expiry Date, as the information will be useful to Metering Coordinators and retailers when assessing the action plan for metering at the site.
	3.	If you do not support the addition of the suggested fields, do you support the addition of the Meter Family Failure field?	N/A

Information Category	Question No.	Question	Participant Comments
	4.	If you do not support the amendments proposed by AEMO, which ones and why?	N/A
	5.	What enumerations can be made for the Meter Use codes that would be useful for the market?	Sample, Solar/PV
	6.	<p>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.</p> <ul style="list-style-type: none"> <li>- 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?</li> </ul>	<ul style="list-style-type: none"> <li>• Asset Management Plan - Not required with proposed fields (MFN Exemption Number &amp; MFN Expiry Date)</li> <li>• Calibration Tables – Not required</li> <li>• Last Test Date – Not required with proposed fields (MFN Exemption Number &amp; MFN Expiry Date); however, better repurposed for inspections, that is becoming “Last Inspection Date” – helps retailers mitigate CT ratio errors</li> <li>• Meter Constant – Not required with proposed fields Transformer Information Field (CT/VT Ratio)</li> <li>• Meter Point – Not required</li> <li>• Meter Program – Not required</li> <li>• Meter Route – Not required for MSATS, this is information that DNSPs can maintain</li> <li>• Meter Test &amp; Calibration Program – Not required with proposed fields (Meter Test Result Accuracy)</li> </ul>

Information Category	Question No.	Question	Participant Comments
			<ul style="list-style-type: none"> <li>• Meter Test Result Notes – not required with proposed fields (Meter Test Result Accuracy)</li> <li>• Next Test Date – would be useful for medium term deployment planning, unless LNSPs provide predictions for family failures</li> <li>• Test Performed By – not required with proposed fields (Meter Test Result Accuracy)</li> </ul>
	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 worth further consideration? If so, why and what value do they add to the market?	<p>Meter Commission Date: This will enable retailers to assist customers that are advising to be without electricity, instead of referring to the distributor.</p> <p>Disconnection Method: This will limit NACK / Not Complete service orders, as it will empower retailers to raise the appropriate request based on what has occurred at site.</p> <p>Meter Locks: This will limit NACK / Not Complete service orders, as it will enable retailers to advise the access requirements to the parties attending site (MC, MP, MDP).</p> <p>Plug-in Meter Flag: This is useful in reducing wasted truck fees; however, if meter type flag correctly identifies a plug-in meter, then there is no need.</p>
	8.	Do you have any other comments regarding the general Metering Installation Information fields?	Near real-time updates to NMI/Meter Status fields would significantly improve the Re-Energisation process.

Information Category	Question No.	Question	Participant Comments
Metering Installation Transformer Information	9.	Do you agree to AEMO's proposal with regards to splitting transformer information into CT and VT?	EnergyAustralia supports AEMO's proposal to split transformer information into CT and VT.
	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, it will provide the required information to retailers to ensure that customers are quoted and service orders are dispatched correctly.
	11.	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.	EnergyAustralia is content with the validations proposed by AEMO.
	12.	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	Yes we agree with this decision, as there is no obvious benefit in storing this information in MSATS.
Register Level Information	13.	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"> <li>- Controlled Load</li> <li>- Time of Day</li> </ul>	<ul style="list-style-type: none"> <li>- <i>Controlled Load</i></li> <li>POOL PUMP</li> <li>HOT WATER</li> <li>SLAB HEATING</li> <li>Other suitable appliances</li> <li>- <i>Time of Day</i></li> <li>AEDT, AEST, ACDT.</li> </ul>

Information Category	Question No.	Question	Participant Comments
	14.	<p>Do you agree with AEMO's proposal to remove the following fields?</p> <ul style="list-style-type: none"> <li>- Demand1</li> <li>- Demand2</li> <li>- Network Additional Information</li> </ul>	EnergyAustralia supports AEMO's proposal to remove the fields.
Connection and Metering point Details	15.	Do you agree with the proposal to include the Connection Configuration field as described above? Why/why not?	Yes, it provides a simple/basic view of the configuration at the site. It is expected that participants could review the connection configuration field as an initial assessment, depending on the configuration further review would be required (i.e. if CT/VT were present).
	16.	Are there any connection configurations that could not be contained in the above Connection Configuration field?	EnergyAustralia believes that the connection configurations in the field represent the majority of configurations. Any remaining configurations not covered are generally highly convoluted and in many cases non-compliant.
Shared Isolation Points Flag Field	17.	Are the values sufficient? What additional information should be provided, and how could it be validated?	Yes, the basic enumerations are acceptable. Identification of shared fusing prior to attending site will limit any NACKing of service orders. Additional information on how to rectify the shared isolation point would need to be determined via a site visit, or via discussions with the distributor; as the configurations are too diverse and complicated to document in MSATS.

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	18.	Should "Unknown" be able to be changed into "Yes" / "No"?	Yes. if 'unknown' is available, all sites will be flagged this way. Limiting the choices will put some onus on distributors to provide the information.
Metering Installation Location Information	19.	Do you support the deletion of Additional Site Information?	EnergyAustralia supports the removal of Additional Site Information, dependent on the addition of GPS coordinates at the meter level.  We do not support the removal of any field that will not be adequately replaced by additional fields or amendments to current fields.
	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.
	21.	Does your organisation support the mandatory provision of GPS coordinates for all rural sites?	EnergyAustralia believes there is merit and value in requiring GPS coordinates available (mandatory) for all areas, not just rural.  There are many instances where meter locations are difficult to determine within urban and city locations.
	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?	EnergyAustralia believes there is merit and value in requiring GPS coordinates available (mandatory) for all areas, not just rural.  There are many instances where meter locations are difficult to determine within urban and city locations.

Information Category	Question No.	Question	Participant Comments
	23.	Does your organisation support the mandatory provision of GPS coordinates for any sites with an MRIM meter?	<p>EnergyAustralia believes there is merit and value in requiring GPS coordinates available (mandatory) for all metering types.</p> <p>There are many instances where meter locations are difficult to determine, and GPS coordinates would alleviate these issues.</p>
	24.	Does your organisation support the mandatory provision of GPS coordinates for any new installations?	Yes, EnergyAustralia strongly supports GPS coordinates being mandatory for all installations, existing and new.
	25.	Does your organisation believe that the provision of this information should be made mandatory for any other scenarios?	Yes, all meter types, old and new. The transition period can provide for the inconvenience and logistical issues. The benefits of accurate meter location will outweigh the negatives in having to obtain the coordinates.
	26.	Does your organisation believe that the provision of this information should be made required for any other scenarios?	No, as above.
	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	<p>EnergyAustralia's preference is for GPS coordinates to six decimal places, as this will enable an accuracy level that is valid for at a meter level.</p> <p>Our view is that GPS coordinates provide a path to remove meter location issues. We believe that G-</p>

Information Category	Question No.	Question	Participant Comments
		the field is added should it be to four, five, or six decimal places?	NAF and DPID are suitable for rectifying address location issues.
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?	EnergyAustralia agrees with AEMO's proposal to remove the fields; however, we understand that these fields are more aligned with MDP requirements, therefore their views on the merit of amending/removal should be paramount.
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, the information that was stored in the removed fields is accessible to the responsible parties for the meters. The majority of meters that would require the information in the removed fields are maintained by the LNSP. With PoC it will further limit the need for this information, as these - predominantly old - meters will be replaced.

## 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?	EnergyAustralia support the removal of unstructured address fields, given a period for data holders to clean their existing data.

Information Category	Question No.	Question	Participant Comments
	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.
	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?	<p>Yes, the G-NAF PID is another step to ensuring accuracy in NMI addresses. This is a significant issue that the industry has had for many years, anything that can be done to reduce the poor customer experience should be adopted.</p> <p>The data initially being updated by AEMO seems to be the best approach, as they can roll out the updates across all LNSPs at once.</p> <p>New addresses should be the responsibility for the LNSP.</p>
	33.	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated entirely by LNSPs?	If the GNAF-PID was only going to proceed if it was updated by the LNSP, we would support this approach as well.
	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?	<p>No, we believe that the G-NAF PID references the DPID.</p> <p>The only consideration is that it can take a few months for G-NAF PID to be updated, in this period it might be useful to have the DPID, as it is updated quicker.</p>

Information Category	Question No.	Question	Participant Comments
	35.	Would your organisation support adding Section Number and DP Number if G-NAF PID were also to be added?	We support the inclusion of Section Number, as this has been highlighted as a requirement in NSW. EnergyAustralia supports any additions that will reduce issues and discrepancies on address or meter location.
	36.	Would your organisation support adding Section Number and DP Number if G-NAF PID were not to be added?	Yes; however, our preference is for both, and at a minimum G-NAF PID.
Feeder Class	37.	Do you agree with the proposal to make Feeder Class required for the jurisdiction of Queensland?	Yes, Feeder Class should be made required in QLD, as this has been highlighted as a requirement in QLD.
Transmission Node Identifier2	38.	Do you agree with the proposal to introduce TNI2?	Yes, we strongly support the introduction of TNI2. As a Local Retailer, we would see significant benefit in improving the accuracy of settlement for cross-border/boundary connection points.

## 2.2 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.	EnergyAustralia agree that the process is lengthy and burdensome for what seem to be obvious changes, however, the main benefit is that any change/field removal would need to go through a

Information Category	Question No.	Question	Participant Comments
			thorough assessment and consultation process, thereby reducing the risk of a field being removed/changed in error.
	40.	Do you support AEMO's proposal? If you do not, please detail why.	EnergyAustralia support the proposal, we are confident that AEMO has the processes in place to ensure that any change to the fields in MSATS will be analysed thoroughly, and not progressed if it is not in the best interest of the market or participants.
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, there should be a requirement for the information to be maintained by participants, but there is no need for it to be accessible via MSATS.

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

Section No/Field Name	Participant Comments
No comment	

### 4. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
No comment	