

31 March 2020



Ms Audrey Zibelman  
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Dear Ms Zibelman

### **Energy Queensland's feedback on the MSATS Standing Data Issues Paper**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide feedback to the Australian Energy Market Operator (AEMO) on the MSATS Standing Data Issues Paper.

Energy Queensland is a Queensland Government Owned Corporation that operates a group of businesses providing energy services across Queensland, including:

- Distribution Network Service Providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network);
- a regional service delivery retailer, Ergon Energy Queensland Pty Ltd; and
- affiliated contestable business, Metering Dynamics.

Energy Queensland's DNSPs, Energex and Ergon Energy Network, and its affiliated contestable business Metering Dynamics, have provided comments against AEMO's template reflecting their respective participant roles. As such, there are two attachments included in Energy Queensland's response.

Energy Queensland looks forward to providing continued assistance to AEMO during this review. Should AEMO require additional information or wish to discuss any aspect of Energy Queensland's feedback, please contact me on (07) 3851 6787 or Alena Christmas on (07) 3851 6784.

Yours sincerely

A handwritten signature in blue ink that reads "Trudy Fraser".

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## MSATS Standing Data Review

- MSDR Issues Paper
- Standing Data for MSATS Guideline

## CONSULTATION – First Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:*** WBAYM and ENERGEXM, ERGONMP, EGXLTDMP and  
ENERGXMP

***Completion Date:*** 31 March 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?	Ergon Energy Network and Energex have no objections, however, seek further clarity on how the MPB is expected to populate this field if they are not the current MPB for the site. Consideration should be given as to whether AEMO should be the responsible party to populate this field.
	2.	Do you support the addition of the Meter Malfunction Exemption Expiry Date field to MSATS? If not, why not?	No. AEMO should be considered as the responsible party to populate this field.
	3.	If you do not support the addition of the suggested fields, do you support the addition of the Meter Family Failure field?	No comments.
	4.	If you do not support the amendments proposed by AEMO, which ones and why?	Ergon Energy Network and Energex have no objections. However, we seek clarity on whether legacy metering is required to be updated. Note

Information Category	Question No.	Question	Participant Comments
			also, that the "Last Test Date is shown as "mandatory" and also to be "Removed".
	5.	What enumerations can be made for the Meter Use codes that would be useful for the market?	N/A
	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>	We see no value in retaining these fields.
	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?	No
	8.	Do you have any other comments regarding the general Metering Installation Information fields?	No

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?	Ergon Energy Network and Energex have no objections with AEMO's proposal. However, we seek clarity on the treatment of legacy metering, in terms of whether there is an expectation for this metering to be updated.
	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?	Ergon Energy Network and Energex have no objections with AEMO's proposal. However, we seek clarity on the treatment of legacy metering, in terms of whether there is an expectation for this metering to be updated.
	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.	Ergon Energy Network and Energex have no objections to this proposal.
	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	Ergon Energy Network and Energex agree to not add CT/VT serial details. However, we consider that there is benefit in having this information available for multi metered/measured sites in order to ascertain the correct relationship between meter and CT/VT.
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>	Ergon Energy Network and Energex agree in relation to the Controlled Load Field. However, we seek clarity on whether data is required to be updated in relation to legacy basic meters.

Information Category	Question No.	Question	Participant Comments
			Ergon Energy Network and Energex use the Time of Day field to determine the peak, off-peak, and shoulder rates.
	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>	<p>Ergon Energy Network and Energex do not support the removal of the Network Additional Information field.</p> <p>However, Demand1 and Demand_2 can be removed.</p>
Connection and Metering point Details	15.	Do you agree with the proposal to include the Connection Configuration field as described above? Why/why not?	<p>Ergon Energy Network and Energex do not see the benefit of this information being populated in MSATS.</p> <p>We seek clarity on whether the MPB is expected to update all existing sites to this new configuration, and if yes, how the MPB will know this information?</p>
	16.	Are there any connection configurations that could not be contained in the above Connection Configuration field?	Ergon Energy Network and Energex believe that the connection configurations have been captured adequately.
Shared Isolation Points Flag Field	17.	Are the values sufficient? What additional information should be provided, and how could it be validated?	In general terms, Ergon Energy Network and Energex agree with this field. The LNSP, while being able to update the field initially, would require the MP to maintain the data in this field as they install Meter Isolation Links as part of any ongoing work at a site.

Information Category	Question No.	Question	Participant Comments
	18.	Should "Unknown" be able to be changed into "Yes" / "No"?	Yes
Metering Installation Location Information	19.	Do you support the deletion of Additional Site Information?	Yes
	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?	Prior to supporting this provision, Ergon Energy Network and Energex would require a cost benefits analysis.
	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?	If GPS coordinates are mandatory, then it should apply to all NMIs.
	23.	Does your organisation support the mandatory provision of GPS coordinates for any sites with an MRIM meter?	If GPS coordinates are mandatory, then it should apply to all NMIs.
	24.	Does your organisation support the mandatory provision of GPS coordinates for any new installations?	If GPS coordinates are mandatory, then it should apply to all NMIs.



Information Category	Question No.	Question	Participant Comments
	25.	Does your organisation believe that the provision of this information should be made mandatory for any other scenarios?	If GPS coordinates are mandatory, then it should apply to all NMIs.
	26.	Does your organisation believe that the provision of this information should be made required for any other scenarios?	If GPS coordinates are mandatory, then it should apply to all NMIs.
	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?	Ergon Energy Network and Energex suggest that five decimal places are appropriate.
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
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

## 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
	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?	Yes, provided that AEMO is responsible for populating this field.
	33.	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated entirely by LNSPs?	No
	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?	Ergon Energy Network and Energex support the removal of the DPID Field.

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?	Ergon Energy Network and Energex believe this is not relevant in Queensland.
	36.	Would your organisation support adding Section Number and DP Number if G-NAF PID were not to be added?	Ergon Energy Network and Energex believe this is not relevant in Queensland.
Feeder Class	37.	Do you agree with the proposal to make Feeder Class required for the jurisdiction of Queensland?	Ergon Energy Network and Energex believe this is only required in ERGONETP Network area rather than whole of Queensland.
Transmission Node Identifier2	38.	Do you agree with the proposal to introduce TNI2?	Yes

### 2.3NER 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
	40.	Do you support AEMO's proposal? If you do not, please detail why.	Yes

Information Category	Question No.	Question	Participant Comments
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

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

No Comments.

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

No comments.

## MSATS Standing Data Review

- MSDR Issues Paper
- Standing Data for MSATS Guideline

## CONSULTATION – First Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

*Participant: MDYMC, MDYMP, MDYMDP, MDYENM*

*Completion Date: 31 March 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. However, we seek clarification on how this field will be populated. For example, would AEMO populate it, based on approving as exemption, with the MP/MC required to maintain/update.
	2.	Do you support the addition of the Meter Malfunction Exemption Expiry Date field to MSATS? If not, why not?	Yes. However, we seek clarification on how this field will be populated. For example, would AEMO populate it, based on approving as exemption, with the MP/MC required to maintain/update.  In addition, we seek clarity on how this field will be reported from MSATS and whether a report will be generated notifying relevant participants a number of days out from expiration.
	3.	If you do not support the addition of the suggested fields, do you support the addition of the Meter Family Failure field?	No comments.



Information Category	Question No.	Question	Participant Comments
	4.	If you do not support the amendments proposed by AEMO, which ones and why?	We note that the LastTestDate field has been flagged for both amendment and removal. Metering Dynamics supports the removal of this field.
	5.	What enumerations can be made for the Meter Use codes that would be useful for the market?	We suggest, Revenue, Check, Logical, Sample enumerations.
	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. <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>	No. Metering Dynamics, sees no value for the market in 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 worth further consideration? If so, why and what value do they add to the market?	No. Metering Dynamics sees no value for the market in these fields.
	8.	Do you have any other comments regarding the general Metering Installation Information fields?	No comments.

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?	Yes
	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
	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.	Yes
	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. Metering Dynamics, supports not adding CT/VT serial numbers and see no benefit from having this detail 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>	Yes. In relation to: <ul style="list-style-type: none"> <li>• controlled load, the value should reference Yes, No; and</li> <li>• Time of Day - All Day, Peak, Off Peak, Shoulder, Interval.</li> </ul>

Information Category	Question No.	Question	Participant Comments
	14.	Do you agree with AEMO's proposal to remove the following fields? <ul style="list-style-type: none"> <li>- Demand1</li> <li>- Demand2</li> <li>- Network Additional Information</li> </ul>	Yes
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. However, we seek clarification on how this field will be populated. For example, would it form part of the CR30xx transactions for an MP or would it be its own transaction.  In addition, we consider that validation between this field for CT/VT Present and the Metering InstallationTransformer Information fields may add value. For example, if Connection Configuration indicates CT/VT present, Metering InstallationTransformer Information must be populated.
	16.	Are there any connection configurations that could not be contained in the above Connection Configuration field?	No
Shared Isolation Points Flag Field	17.	Are the values sufficient? What additional information should be provided, and how could it be validated?	Yes
	18.	Should "Unknown" be able to be changed into "Yes" / "No"?	Yes

Information Category	Question No.	Question	Participant Comments
Metering Installation Location Information	19.	Do you support the deletion of Additional Site Information?	Yes, subject to the Hazard and Meter Location fields being increased in size in order to handle additional information.
	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?	Yes
	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?	Yes
	23.	Does your organisation support the mandatory provision of GPS coordinates for any sites with an MRIM meter?	Yes. However, we seek clarification on whether this provision will also apply to MRAM sites.
	24.	Does your organisation support the mandatory provision of GPS coordinates for any new installations?	Yes

Information Category	Question No.	Question	Participant Comments
	25.	Does your organisation believe that the provision of this information should be made mandatory for any other scenarios?	No
	26.	Does your organisation believe that the provision of this information should be made required for any other scenarios?	Yes
	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?	Metering Dynamics supports 5 decimal places if the field is added.
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
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

## 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
	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. Metering Dynamics considers that any additional information can be captured in other fields.
	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?	Yes
	33.	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated entirely by LNSPs?	Yes
	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?	No

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?	Our understanding is that these fields would not be required if the G-NAF PID is added as they are identifiable via the G-NAF PID.
	36.	Would your organisation support adding Section Number and DP Number if G-NAF PID were not to be added?	Yes
Feeder Class	37.	Do you agree with the proposal to make Feeder Class required for the jurisdiction of Queensland?	Yes
Transmission Node Identifier2	38.	Do you agree with the proposal to introduce TNI2?	Yes

### 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. In our opinion, Schedule 7.1 should only be providing the high-level requirements for the Metering Register and the details held within the relevant market procedures - MSATS Procedures (CATS, WIGS, Standing Data for MSATS, etc.).

Information Category	Question No.	Question	Participant Comments
	40.	Do you support AEMO's proposal? If you do not, please detail why.	Yes
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 agree to these fields being removed from Schedule 7.1.

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

No Comments.

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

Heading	Participant Comments
Availability of resources for systems development and testing (including industry testing)	As has been noted throughout this consultation process, Metering Dynamics is concerned that the impacts of other market rule changes, including for example, the Five-Minute Settlement, Global Settlement, MC Planned Interruptions, and Customer Switching, are not adequately being considered. These rule changes require businesses to allocate resources, identify and develop processes and systems, test changes both internally and externally, and then be ready to deploy.



Heading	Participant Comments
	As such, Metering Dynamics strongly recommends that AEMO considers the timing and potential alignment of these to ensure minimum impact on businesses.