

MSATS Standing Data Review

- MSDR Issues Paper
- Standing Data for MSATS Guideline

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE

Participant: PLUS ES

Completion Date: 31/03/2020

Table of Contents

- 1. Questions raised in the MSATS Standing Data Review Issues Paper 3
- 2. Proposed Changes in Standing Data for MSATS Guideline 18
- 3. Other Issues Related to Consultation Subject Matter..... 20

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

1.1 Metering Installation Information

Information Category	Question No.	Question	Participant Comments
General Metering Installation Information	1.	Do you support the addition of the Meter Malfunction Exemption Number field to MSATS? If not, why not?	<p>PLUS ES supports the addition of the Meter Malfunction Exemption Number field to MSATS but the support is dependent on the solution/process being efficient.</p> <p>It would provide visibility to all participants responsible for that NMI, consequently removing the administrative resource effort between participants enquiring on the status of the malfunction rectification. i.e. simplify the current meter malfunction exemption procedures with respect to notifying affected participants.</p> <p>To drive further efficiency and remove the 'middle man', AEMO would be the best positioned party to upload the information as they are the party which provide the exemption.</p> <p>The inclusion of this field would need to be coupled with the development/updating of procedures i.e. administering this field, updating exist procedures for redundant actions etc.</p>

	2.	Do you support the addition of the Meter Malfunction Exemption Expiry Date field to MSATS? If not, why not?	<p>PLUS ES supports the addition of the Meter Malfunction Exemption Expiry Date field to MSATS but the support is dependent on the solution/process being efficient.</p> <p>It would provide visibility to all participants responsible for that NMI, consequently removing the administrative resource effort between participants enquiring on the status of the malfunction rectification.</p> <p>To drive further efficiency and remove the ‘middle man’, AEMO would be the best positioned party to upload the information as they are the party which provide the exemption.</p> <p>The inclusion of this field would need to be coupled with the development/updating of procedures i.e. administering this field, updating exist procedures for redundant actions etc.</p>
	3.	If you do not support the addition of the suggested fields, do you support the addition of the Meter Family Failure field?	<p>Whilst PLUS ES conditionally supports the suggested fields we also support the requirement to identify a meter categorised as Meter Family Failure.</p> <p>If this field is not available and the exemption would no longer be available due to a prolonged barrier i.e. customer consent etc, it would be onerous to manage the rectification of a MFF, especially in instances that participant role were to change. i.e. an incoming FRMP, new MC, new MPB</p>

	4.	If you do not support the amendments proposed by AEMO, which ones and why?	<p>PLUS ES does not oppose the provisioning of this information (Last Test Date and Meter Test Result Accuracy) into MSATS, if the industry can see value, but question their effectiveness.</p> <p>PLUS ES also suggests separate fields for each value would be preferable than the combined from an efficiency perspective.</p> <p>The provisioning of these 2 fields is simplified and doesn't give the full picture of the circumstances, such as which components pass and fail, by how much, for how long and what adjustments to data might be required.</p> <p>Furthermore, this information doesn't indicate that the meter or metering installation is part of a sample testing scheme or has been individually tested. Therefore, for other market participants, this information would be misleading and incomplete.</p>
	5.	What enumerations can be made for the Meter Use codes that would be useful for the market?	<p>PLUS ES proposes the following enumeration:</p> <ul style="list-style-type: none">- Revenue- Check- Statistical- Information

	6.	There are several existing fields that AEMO proposes removing from MSATS Standing Data. Do you see any value in their retention for the market? If so, please outline it.	<p>PLUS ES supports the removal of all fields as suggested by AEMO. Some care needs to be taken to ensure values in Meter Constant are reflected in the Register Multiplier field before the Meter Constant field is removed.</p> <p>For example, with some BASIC meters the Meter Constant may be 40, but the register value maybe 1. Removing Meter Constant in these instances will give incorrect consumption values.</p>
	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?	<p>As above in Qn6.</p> <p>Aspects such as the internal Wh/Pulse of the meter is just a characteristic of the meter make/model, therefore it shouldn't be in MSATS as a separate field.</p>
	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?	<p>PLUS ES support the requirement to identify metering installations as Meter Family Failures (MFF). This information should not be derived from the exemption field alone.</p> <p>If the exemption was no longer provided i.e. customer does not consent to exchange a MFF meter etc, it would be onerous to manage the replacement of the MFF meter, especially in instances where participant role/s were changed. i.e. an incoming FRMP, new MC, new MPB</p>

	<p>9.</p>	<p>Do you have any other comments regarding the general Metering Installation Information fields?</p>	<p>MRAM reason code was discussed but has been omitted from the issue paper and the identified fields.</p> <p>PLUS ES believes the ability to preferably identify or derive in MSATS if an MRAM meter is due to no network coverage, etc, provides value to participants. It will drive process efficiencies, cost reductions and support participants to meet their obligations. Especially in scenarios where a customer who requested the MRAM has moved out of a site, and the meter could potentially have the communications re-established. If there is an Incoming FRMP they do not have this information available to them.</p> <p>MCs who have the obligation to maintain this information and ensure that metering installation is a type 4, are not the participants who have the customer relationship, interaction and knowledge of customer movements (move in/move out).</p> <p>An incoming/new MC on an NMI do not know what has triggered the MRAM status. They could attempt to rectify a potential telecommunication coverage issue, but the reason could be that the customer refused the communications on the meter. The process of being compliant to MC Obligations with respect to meter communications is currently inefficient.</p>
--	-----------	---	---

<p>Metering Installation Transformer Information</p>	<p>10.</p>	<p>Do you agree to AEMO’s proposal with regards to splitting transformer information into CT and VT?</p>	<p>PLUS ES suggests it would be valuable to have a flag that identifies if a meter is associated with a CT and/or VT (or neither). This would be beneficial in assisting market participants with identifying how the site needs to be managed. It would be easier to maintain/update with minimal burden.</p>
	<p>11.</p>	<p>Do you agree to AEMO’s proposal with regards to adding new transformer information fields which includes: CT/VT Accuracy Class, CT/VT Last Test Date?</p>	<p>PLUS ES does not oppose these fields if value is delivered. MC & MP must properly asset manage CT’s and VT’s because of NER compliance. The details required for this are complex and best kept within the MP & MC systems. Reflecting a partial amount of this in MSATS would just be a burden without benefit for the market.</p> <p>If Last Test Date for CT and last test date for VT had to be included, then this would need to be enumerated to identify if the CT was associated with a sample plan or a timetabled plan. This is because the LV CT’s on a sample plan are “tested” by the family.</p> <p>The drawback of having these dates in MSATS is that it will encourage discrimination by FRMP’s selecting these sites.</p>
	<p>12.</p>	<p>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.</p>	<p>See comments above with respect to CT/VT</p>

	13.	Do you agree to not to add CT/VT serial number fields, and if you do not agree, can you propose solutions for adding those fields in (i.e. new NMI devices table) and will adding them provide more benefit than costs to your business and customers	PLUS ES supports to not include the CT/VT serial number fields in MSATS. It can only be reflected at a cost to PLUS ES for little if any benefit.
Register Level Information	14.	Do you agree with amending the fields Controlled Load and Time of Day to include enumerated list of values? If Yes, what values can be in the enumerated list for the fields: <ul style="list-style-type: none"> - Controlled Load - Time of Day 	PLUS ES supports amending the fields and enumerating them. <ul style="list-style-type: none"> - Controlled Load – Yes, No, External - Time Of Day – Interval, Peak, Shoulder, Off Peak, Demand, Capacity, CL1, CL2, CL3, CLS*, Other <p>*CLS = Controlled Load Special. Network Tariff would advise the type of Controlled Load.</p>
	15.	Do you agree with AEMO's proposal to remove the following fields? <ul style="list-style-type: none"> - Demand1 - Demand2 - Network Additional Information 	PLUS ES supports the proposed removal of these fields.

<p>Connection and Metering point Details</p>	<p>16.</p>	<p>Do you agree with the proposal to include the Connection Configuration field as described above? Why/why not?</p>	<p>PLUS ES agrees with the objective of this field, however not in the form that it is presented. It is suggested that the enumeration could be simplified into a code with a description and reducing some of the details that could be difficult to ascertain.</p> <p>PLUS ES proposes the following enumeration, believing it would achieve most of the benefits of the AEMO proposed fields whilst minimising its complexity and cost of maintenance:</p> <ul style="list-style-type: none"> • Low Voltage Direct Connected • Low Voltage CT Connected • High Voltage CT & VT Connected <p>The 'number of phases' is excluded, as it is difficult to ascertain accurately in some direct connected cases, where there may be some nuances that are difficult to enumerate. i.e. a two-phase supply fed from a three-phase network - metering achieved with two single phase meters.</p>
	<p>17.</p>	<p>Are there any connection configurations that could not be contained in the above Connection Configuration field?</p>	<p>PLUS ES has no comment.</p>

<p>Shared Isolation Points Flag Field</p>	<p>18.</p>	<p>Are the values sufficient? What additional information should be provided, and how could it be validated?</p>	<p>Single point of isolation / Shared fuse is a historical issue which now is being addressed following deregulation. There are process driven and cost efficiencies to be gained if a NMI with a shared isolation point is identified.</p> <p>LNSPs are the best positioned to update the information against the NMI and more comprehensively against all the NMIs of a site with shared fuses as they are the common participant. An MPB/MC may not be the participant for all the NMIs.</p>
	<p>19.</p>	<p>Should "Unknown" be able to be changed into "Yes" / "No"?</p>	<p>PLUS ES suggests the ability to update Unknown to Yes/No should be available, including the ability to amend the Yes to a No and vice versa.</p> <p>However further requirements of these fields have a dependency on the MC Planned Outage determination. This has been delayed until 21 May 2020.</p> <p>Given that the submissions on the draft report are due on the 22 May 2020, PLUS ES recommends that AEMO considers an extension to this date to allow participants to review the final rule and incorporate feedback as applicable into their submission.</p>

Metering Installation Location Information	20.	Do you support the deletion of Additional Site Information?	PLUS ES supports the deletion of the Additional Site Information.
	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)	PLUS ES assumes that Meter Location field referenced is the Location field in Standing Data for MSATS doc. It is when meters are hidden from view or not located where you would expect them to be that the information proves valuable; such as in an outbuilding: barn, shed, dairy building or near the dam of the property or in the basement of a building.
	22.	Does your organisation support the mandatory provision of GPS coordinates for all rural sites?	PLUS ES supports the provision of GPS co-ordinates for rural areas, however question the benefit of mandatory. There is always the question of a cost benefit analysis if they were mandatory. PLUS ES supports and recommends the process to obtain GPS co-ordinates when at the site is best endeavours but a Required field in MSATS. Provide the co-ordinates when you have obtained them. Otherwise making the field mandatory may deliver inaccurate or false records.

	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?	<p>Postcodes cannot be used to determine whether a site is rural, and most post codes will contain both rural and non-rural zoning. Using this post code would require a country town to include GPS coordinates which is not the intent.</p> <p>The definition of rural areas is generally determined by state or council zoning.</p> <p>Hence, PLUS ES recommends the process to obtain GPS co-ordinates when at the site is best endeavours but a Required field in MSATS.</p>
	24.	Does your organisation support the mandatory provision of GPS coordinates for any sites with an MRIM meter?	<p>PLUS ES recommends a cost benefit analysis as the MRIM is a declining metering population for NECF states. Does MRIM include VIC AMI meters?</p> <p>We also seek clarity why the requirement is only MRIM and does not include MRAM meters.</p>
	25.	Does your organisation support the mandatory provision of GPS coordinates for any new installations?	<p>PLUS ES supports the Required provision of GPS co-ordinates for any new metering installation, to cater for the scenario when the GPS co-ordinates cannot be captured.</p>

	26.	Does your organisation believe that the provision of this information should be made mandatory for any other scenarios?	PLUS ES believes that making the field mandatory for any scenario will be a costly proposition. What happens if the network coverage prevents the information being captured or there is a requirement to procure technology not reliant on network coverage? For that purpose PLUS ES recommends the fields to be Required .
	27.	Does your organisation believe that the provision of this information should be made required for any other scenarios?	PLUS ES believes that the requirement to capture GPS co-ordinates should be the same irrespective of the type or the location of the meter. The procedure should encourage best endeavours to capture GPS co-ordinates, but the field population should be Required .
	28.	Bearing in mind that GPS coordinates to four decimal places allow identification to the nearest 10 metres, that GPS coordinates to five decimal places allows identification to the 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?	PLUS ES supports the 5 decimal places (identification to the nearest 1 m). Anything greater than 5 decimal places would be redundant and anything less may not deliver the benefits.

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?	PLUS ES supports both proposals: <ul style="list-style-type: none"> making the NSRD a required field; only for manually read meters and removing the estimation fields.
Meter Communications Information	30.	Do you agree with AEMO's proposal to remove the meter communications information fields as per the proposal above, if not please specify which ones you do not agree with and why?	PLUS ES supports the removal of the communications fields, they are no longer relevant to the market where dynamic IPs are used.

1.2 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?	PLUS ES supports the proposal for the removal of Unstructured Address fields.
	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?	PLUS ES has not identified any reasons to maintain 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?	PLUS ES supports that the G-NAF PID is added to MSATS, however, we do not believe this information alone will eliminate the challenges of locating/identifying a site. One of its limitations is that G-NAF supports the delivery address and not the site address. A combination of GPS co-ordinates, Structured Address fields and the G-NAF PID will ultimately provide the most complete location information.
	34.	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated entirely by LNSPs?	PLUS ES has not comment.
	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?	PLUS ES understands that there is a % of locations that the G-NAF PID will not identify. DPID should be maintained if it provides value to participants. This field should be Required . Provide if you have the information.
	36.	Would your organisation support adding Section Number and DP Number if G-NAF PID were also to be added?	PLUS ES recommends the field to be Required
	37.	Would your organisation support adding Section Number and DP Number if G-NAF PID were not to be added?	PLUS ES recommends the field to be Required
Feeder Class	38.	Do you agree with the proposal to make Feeder Class required for the jurisdiction of Queensland?	PLUS ES has not comment.

Transmission Node Identifier2	39.	Do you agree with the proposal to introduce TNI2?	PLUS ES agrees with the proposal to introduce TNI2 – given the limited volumes it could remain in MSATS only.
----------------------------------	-----	---	---

1.3 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.	PLUS ES does not see any benefit in retaining Schedule 7.1 as is.
	41.	Do you support AEMO's proposal? If you do not, please detail why.	PLUS ES supports AEMO's proposal.
Fields referenced in the NER that are not implemented in MSATS	42.	Do you see any benefit in adding the aforementioned fields to MSATS? If so, in which table would you propose they be added and how can the quality of data be ensured?	PLUS ES hasn't identified any potential business/market efficiencies driven by these fields being added to MSATS.

2. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments
General	<p>PLUS ES understood the discussion was to eliminate the optional fields in MSATS.</p> <p>Hence, it recommends that the fields should be amended to 'Required'. i.e. Measurement Type should be 'Required' with a note in the description field "NOT USED for Type 6&7 Transfers.</p>
Read Type Code	<p>PLUS ES recommends that this field should be made Mandatory. Participants will know this information.</p> <p>The Bulk Upload Tool should be considered for initial bulk population of fields.</p>
Shared Fuse v45	<p>PLUS ES notes that the value of Unknown has been discussed in the issue paper. But has been missed from the 'Standing Data for MSATS' document.</p> <p>PLUS ES suggests for the description field to be reworded:</p> <p>A flag to indicate whether the metering installation has a shared fuse, where:</p> <ul style="list-style-type: none"> • 'Y' = shared fuse is present. • 'N' = shared fuse is not present and • 'Unknown' = not known

Shared Fuse v51	This field has been indicated to be updated in v45. PLUS ES suggests that this version is then not changed marked in v51 doc, similarly aligned with the approach taken with the field Read Type Code field.
GPS Co-ordinates	See comments to questions in issue paper.
Hazard	PLUS ES suggests this should be a Required field – instead of optional
Location	PLUS ES suggests this should be a Required field – instead of optional.
MeterMalfunctionExemptionNumber	<p>PLUS ES supports the inclusion of this field in MSATS as it will drive process efficiencies and delivers visibility to all affected participants.</p> <p>The MC has the obligation to raise a Meter Exemption – AEMO provides the exemption number. For this reason PLUS ES recommends that the party to provide the value in MSATS efficiently would be AEMO.</p> <p>Furthermore consideration needs to be provided to the removal of this information when the meter malfunction has been rectified.</p>
MeterMalfunctionExemptionExpiryDate	<p>PLUS ES supports the inclusion of this field in MSATS as it will drive process efficiencies and delivers visibility to all affected participants.</p> <p>The MC has the obligation to raise a Meter Exemption – AEMO provides the exemption expiry date. For this reason PLUS ES recommends that the party to provide the value in MSATS efficiently would be AEMO.</p> <p>Furthermore consideration needs to be provided to the removal of this information when the meter malfunction has been rectified.</p>

NextScheduledReadDate	<p>PLUS ES suggests Remove “For all type 5 and 6 meters” from Standing Data Required field. This field is also required for MRAM meters.</p> <p>Some proposed wording changes for the description field:</p> <p>Indicates the Next Scheduled Read Date for the meter, when manual Meter Readings are required.</p>
-----------------------	--

3. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
	n/a