

MSATS Standing Data Review

- MSDR Issues Paper
- Standing Data for MSATS Guideline

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: United 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	a)	Do you support the addition of the Meter Malfunction Exemption Number field to MSATS? If not, why not?	United Energy supports this addition.
	b)	Do you support the addition of the Meter Malfunction Exemption Expiry Date field to MSATS? If not, why not?	United Energy supports this addition.
	c)	If you do not support the addition of the suggested fields, do you support the addition of the Meter Family Failure field?	United Energy supports the addition of the Meter Family Failure Field and allow it to be used for flagging meters that are part of a family that has failed sample family testing, the same field should be used for Current Transformers that are part of a family that has failed sample family testing. Also see our answers to (i) and (l) further below.

Information Category	Question No.	Question	Participant Comments
	d)	If you do not support the amendments proposed by AEMO, which ones and why?	N/A
	e)	What enumerations can be made for the Meter Use codes that would be useful for the market?	United Energy does not hold a position on this matter.
	f)	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.	United Energy agrees with the removal of these fields.
	g)	<u>Meter Constant</u> may be a relevant field for older equipment as it refer 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?	United Energy does not hold a position on this matter.
	h)	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?	United Energy does not support the inclusion of the proposed fields.
	i)	Do you have any other comments regarding the general Metering Installation Information fields?	United Energy seeks clarification on section 3.1.1. Table 1 (page 8) of the Issues paper, states that Last Test Date will be repurposed and will be a mandatory field. Further down in the table it states Meter Test Accuracy will be amended to be in date format with a pass/fail flag.

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			<p>Table 2 (page 10) outlines the fields that will be removed from MSATS. For Last Test Date states, 'Assuming the Meter Test Result Accuracy field will be implemented as described, this field will be redundant and can be removed.'</p> <p>United Energy strongly recommends the 'Last Test Date' field be retained with the date of the test, otherwise the results of the test recorded in 'Meter Test Accuracy' will be meaningless.</p> <p>Also, we (and assumingly most other MP's) replace any meter, at time of test, that fails the meter accuracy test (this is true for us with our 100% CT meter testing as well as our AS1284.13 Sample testing of direct connected meters). In this instance, there appears little point to have a mandatory field to record the pass/fail results (and particularly the fail result) of a removed meter?</p> <p>The installed meter serial number will then change in the NMI standing data from the failed meter to the replacement meter and the pass /fail flag will appear to be totally irrelevant to the newly installed meter?</p> <p>However, we also test direct connected meters as part of a family, and where a family is 'failed' through sample testing, there is a need to be able to flag 'all' meters in that family with a Family Fail Flag, as those other meters will not have been replaced</p>

Information Category	Question No.	Question	Participant Comments
			<p>during the sample testing process.</p> <p>If test result pass/fail details are going to replace or enhance the 'Last Test Date' record, then this should be itemised for not only the meter itself, but other components of the metering installation including LV Current Transformers and HV Voltage Transformers and HV Current Transformers.</p> <p>The "Last Test Date" Field should also be able to record the last test year of a Family Test, where the individual meters (or LVCT's) have not been tested, but are covered by sample testing within their family in that year, and in that case "Family Test 2020" should be entered.</p> <p>Should a family failure occur (of sample tested meters or LVCT's) then all members of the family should have their failure recorded in the "Meter Family Failure Field see (c).</p>
Metering Installation Transformer Information	j)	Do you agree to AEMO's proposal with regards to splitting transformer information into CT and VT?	United Energy supports splitting transformer information into CT and VT, provided it only applies to new sites or where work is performed post the introduction of this change.
	k)	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?	United Energy supports splitting transformer information into CT and VT, provided it only applies to new sites or where work is performed post the introduction of this change.

Information Category	Question No.	Question	Participant Comments
	l)	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>United Energy believes the treatment of family testing of LVCT's need to be addressed, where the sample testing of a set of CT's, each with their own test dates, should when completed allow for the remaining CT's in that family to be labelled as "Family Test 2020" etc. This will confirm they have not been individually tested but covered by the family sampling process.</p> <p>Where an LVCT Family fails, that CT Family failure should be recorded in the "Meter Family Failure Field" see (c).</p>
	m)	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	United Energy agrees to not add CT/VT serial number fields.
Register Level Information	n)	<p>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:</p> <ul style="list-style-type: none"> - Controlled Load - Time of Day 	United Energy does not agree with amending these fields as the amendments do not create any benefit for the distributor. Load control could be dynamically controlled by distributor's which would make these amendments redundant.
	o)	Do you agree with AEMO's proposal to remove the following fields?	United Energy supports AEMO's proposal.

Information Category	Question No.	Question	Participant Comments
		<ul style="list-style-type: none"> - Demand1 - Demand2 - Network Additional Information 	
Connection and Metering point Details	p)	Do you agree with the proposal to include the Connection Configuration field as described above? Why/why not?	United Energy supports AEMO's proposal.
	q)	Are there any connection configurations that could not be contained in the above Connection Configuration field?	United Energy does not have any other meaningful configurations that are justified for inclusion.
Shared Isolation Points Flag Field	r)	Are the values sufficient? What additional information should be provided, and how could it be validated?	United Energy strongly recommends that only a Yes or blank is required. We believe that authenticating or updating the No's will create unnecessary work without achieving any benefit. If the field is blank it should be assumed that shared isolation does not exist.
	s)	Should "Unknown" be able to be changed into "Yes" / "No"?	United Energy strongly recommends that only a Yes or blank is required. We believe that authenticating or updating the No's will create unnecessary work without achieving any benefit. If the field is blank it should be assumed that shared isolation does not exist.
Metering Installation	t)	Do you support the deletion of Additional Site Information?	United Energy supports this deletion.

Information Category	Question No.	Question	Participant Comments
Location Information			
	u)	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)	United Energy does not hold a position on this matter.
	v)	Does your organisation support the mandatory provision of GPS coordinates for all rural sites?	United Energy supports the provision of GPS coordinates for all, not just rural sites. This should apply only to new connections, meter exchanges or changes in the Meter Provider role post the introduction of this change.
	w)	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?	United Energy supports the provision of GPS coordinates for all, not just rural sites.
	x)	Does your organisation support the mandatory provision of GPS coordinates for any sites with an MRIM meter?	United Energy supports the provision of GPS coordinates for sites with an MRIM meter.
	y)	Does your organisation support the mandatory provision of GPS coordinates for any new installations?	United Energy supports the provision of GPS coordinates for new installations.
	z)	Does your organisation believe that the provision of this information should be made mandatory for any other scenarios?	United Energy supports the provision of GPS coordinates post a meter replacement or meter churn.

Information Category	Question No.	Question	Participant Comments
	aa)	Does your organisation believe that the provision of this information should be made required for any other scenarios?	United Energy supports the provision of GPS coordinates post a meter replacement or meter churn.
	bb)	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?	United Energy recommends that 5 decimal places is about right as there is no additional benefit in being any more exact. Accuracy to within a meter is more than adequate.
Meter Read and Estimation Information	cc)	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?	United Energy supports AEMO's proposal.
Meter Communications Information	dd)	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?	United Energy supports AEMO's proposal.

2.2 NMI details

Information Category	Question No.	Question	Participant Comments
Address Structure	ee)	Do you agree with the proposal to remove unstructured address fields, following a period for data holders to clean their existing data?	United Energy does not support the removal of unstructured address fields. We don't see any benefit in doing so and it would only result in additional cost and complexity.
	ff)	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?	United Energy does not support the removal of unstructured address fields. We don't see any benefit in doing so and it would only result in additional cost and complexity.
	gg)	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?	United Energy does not support the use of G-NAF PID as the benefits would not outweigh the cost and complexity of introducing this change.
	hh)	Do you agree with the proposal to add G-NAF PID to MSATS if the data were populated entirely by LNSPs?	United Energy does not support this proposal.
	ii)	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?	United Energy does not support the use of G-NAF PID and recommends AEMO retains the DPID field.

Information Category	Question No.	Question	Participant Comments
	jj)	Would your organisation support adding Section Number and DP Number if G-NAF PID were also to be added?	United Energy does not support the use of G-NAF PID.
	kk)	Would your organisation support adding Section Number and DP Number if G-NAF PID were not to be added?	United Energy does not support the use of G-NAF PID.
Feeder Class	ll)	Do you agree with the proposal to make Feeder Class required for the jurisdiction of Queensland?	United Energy does not believe this change is relevant in Victoria.
Transmission Node Identifier2	mm)	Do you agree with the proposal to introduce TNI2?	United Energy supports this proposal.

2.3 NER Schedule 7.1

Information Category	Question No.	Question	Participant Comments
NER Schedule 7.1 Rule Change	nn)	Do you see any benefit in Schedule 7.1 remaining as-is? If so, please detail the benefit.	United Energy does not see any benefit in retaining Schedule 7.1 as-is.
	oo)	Do you support AEMO's proposal? If you do not, please detail why.	United Energy supports this proposal.

Information Category	Question No.	Question	Participant Comments
Fields referenced in the NER that are not implemented in MSATS	pp)	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?	United Energy does not see any benefit in adding the fields in MSATS.

3. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments

4. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Standing Data for MSATS 4. CATS Meter Register – ReadTypeCode – RWD5/15/30.	As the RWD label is only applicable in Victoria, United Energy proposes that changes are applied as follows: <ol style="list-style-type: none"> a. Leave the existing AMI meter fleet with RWD – as they are currently 30 minute then assume no change to the TI unless specified as per below b. Where an existing meter is updated to 5 min TI that the RWD is also updated to reflect this e.g. RWDA c. When a new meter is installed that RWDA is applied d. MRIMs are updated to M 1 or 3 due to the low volumes of existing metering
Standing Data for MSATS	There are currently limitations on the house number field: <ol style="list-style-type: none"> a. No more than 5 characters b. Does not allow for characters such as – (e.g. 15-18 XXX Rd) These limitations force United Energy to update the address as unstructured, we recommend that AEMO amend these limitations.
General	United Energy has some general concerns about the volumes of CRs that would be required to update MSATS – our daily limits would need to be lifted considerably or does AEMO propose an alternative way to make these updates?