

MSATS Standing Data Review

- MSDR Second Draft Determination and Report
- MSATS Procedures – WIGS
- MSATS Procedures – CATS
- Standing Data for MSATS Guideline
- Retail Electricity Market Procedures Glossary & Framework
- Exemption Procedure Meter Installation Malfunctions
- Metrology Procedure Part A

CONSULTATION – Second Draft Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: AGL

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1. Context

This template is to assist stakeholders in giving feedback to the questions raised in the Second Draft Report about the proposed changes to the MSATS Standing Data, and to the second draft changes highlighted in **YELLOW** in the change marked versions of the different procedures and guidelines released in the second draft stage of consultation.

2. Questions raised in the MSATS Standing Data Review Second Draft Report

2.1 Material Issues

Information Category	Question No.	Question	Participant Comments
Metering Installation Transformer Information	1.	The proposed CT/VT fields values and validations, as listed above, are provided as examples to stimulate feedback from participants. AEMO notes some feedback that options are missing for CT Types, to allow for HV CTs and LV Special CTs. What is the list of values and validations that you need or want for the enumerated list for the various CT/VT fields? (In the absence of any such feedback, the list proposed by AEMO would provide the initial values for the CT/VT fields)?	

3. Proposed Changes in MSATS Procedures – CATS

Please provide feedback to the ~~the~~ changes highlighted in yellow in the change marked version of the document

Section No/Field Name - CATS	Participant Comments
2.2 (r)	<p>AGL questions the placing of the shared fuse obligation in the MSATS CATS procedures and the proposed timings to notify parties, not obligations to update MSATS.</p> <p>The AEMC Final Determination and Rule specified the LNSP be notified of a Shared Fuse Arrangement ‘as soon as practicable’ in the Metrology Procedures, not the CATS Procedures¹.</p> <p>While it has been proposed via the MSATS consultation to include an enumerated flag in MSATS, there is currently no defined process for the notification of the LNSP.</p> <p>If the process is determined to be aligned to the request for isolation, then that is appropriate notification to the LNSP, and the obligation to update MSATS would sit with the LNSP, and would be best served by updating MSATS after the meter exchange, when or if the flag requires updating.</p> <p>If the notification of a Shared Fuse is via MSATS, then two business days may make any meter exchange process unnecessarily cumbersome. If the notification is via B2B, then there should be no obligation in the CATS Procedures.</p> <p>AGL would suggest that until the process for managing shared fuses is resolved, that there should be no amendment to the CATS Procedures.</p>
2.2(s)	See comments relating to 2.2(r)

¹ AEMC, National Electricity Amendment (Introduction of metering coordinator planned interruptions) Rule 2020 No. 7, p 8

Section No/Field Name - CATS	Participant Comments
2.3(r)	<p>See comments per 2.2(r)</p> <p>As stated previously, until the process for managing shred fuse arrangements are finalised, there should be no obligation placed within the CATS Procedures.</p> <p>The proposed obligations [2.3(r) to 2.3(t)] assume that updating MSATS is the only action happening. If a shared fuse is identified as part of a meter exchange, then updating MSATS within 2 business days will likely lead to MSATS flags being changed 3 times over a short period of time for no real benefit to industry. It would be more efficient for the LNSP to update MSATS to the final flag following the installation of the new isolation or the failure to install additional isolation. The affected participants are already aware of the issue and therefore updating MSATS through the course of a meter exchange will simply create multiple transactions across industry which will not be used.</p>
2.3(s)	See comments per 2.3(r)
2.3(t)	See comments per 2.3(r)
2.6(k)	See comments per 2.2(r) and 2.3 (r).
2.6(l)	<p>See comments per 2.2(r) and 2.3 (r).</p> <p>Note – there is no 2.6(l) in the mark up.</p>
2.9(k)	<p>Noted. And 2.2 (f).</p> <p>However, unlike many other CATS obligations, these ones don't seem to have any timing obligations associated with them. This information is being included in MSATS to provide efficiencies across both retail, MC and Network businesses, therefore it would be appropriate that these fields are updated promptly.</p>
9.1.4	Noted

Section No/Field Name - CATS	Participant Comments
9.3.4(c)	<p>Noted.</p> <p>However, as the participant may not be responsible for some items of information (eg Meter Serial ID, meter manufacturer), AGL suggests that the following sentence be amended:</p> <p style="padding-left: 40px;">Populate a Change Request with the following information as applicable: or the Meter Serial ID / Manufacturer should be removed from this requirements.</p> <p>AGL suggest that this will become especially problematic, where commercial MCs have been made responsible for network meters, or where LNSPs are no longer responsible for meters. AGL believes that this should be an MP responsibility.</p> <p>Also, as no meter exists for a UMS site (both contestable and non-contestable) will a meter number be defined for UMS connections. Noting that there is discussion in using network sampling devices for UMS loads, then it would be appropriate for those devices to be identified if needed.</p>
9.3.4(e)	<p>Noted.</p> <p>However, as the participant may not be responsible for some items of information (eg CT/VT information), AGL suggests that the following sentence be amended:</p> <p style="padding-left: 40px;">Populate a Change Request with the following information as applicable:</p>
9.4.4(c)	<p>Noted.</p> <p>However, as the participant may not be responsible for some items of information (meter information), AGL suggests that the following sentence be amended:</p> <p style="padding-left: 40px;">Populate a Change Request with the following information as applicable:</p> <p>AGL believes that this should be an MP responsibility.</p>

Section No/Field Name - CATS	Participant Comments
9.4.4(d)	<p>Noted.</p> <p>However, as the participant may not be responsible for some items of information (eg CT/VT information), AGL suggests that the following sentence be amended:</p> <p style="padding-left: 40px;">Populate a Change Request with the following information as applicable:</p> <p>AGL believes that this should be an MP responsibility.</p>
10.1.4(c)	Noted
10.1.4(e)	Noted
10.2.4(g)	Noted
10.3.4(d)	MPB requirement – Noted for Meter Model and Manufacturer.
10.3.4(h)	Noted
10.4.4(d)	<p>AGL questions why the MC has an obligation placed on it to maintain the meter manufacturer and model number, when the responsibility should sit with the Meter Provider.</p> <p>AGL suggest that this will become especially problematic, where commercial MCs have been made responsible for network meters.</p>
10.4.4(g)	Noted

Section No/Field Name - CATS	Participant Comments
10.5.4(c) / (d)	<p>Noted.</p> <p>However, as the participant may not be responsible for some items of information, AGL suggests that the following sentence be amended:</p> <p style="padding-left: 40px;">Populate a Change Request with the following information as required:</p> <p>AGL questions why the MC has an obligation placed on it to maintain the meter manufacturer and model number, GPS coordinates etc when the responsibility should sit with the Meter Provider.</p> <p>As a general comment across these changes, AGL suggests that the obligation lie with the participant most closely associated with the asset, as this will become especially problematic, where commercial MCs have been made responsible for network meters, and the network is the Meter Provider, and the network Meter Provider should be responsible for the maintenance and updating of this information.</p>
10.5.4(g)	Noted. See above comments.
15.1.4(f)	Noted

Section No/Field Name - CATS	Participant Comments
Table 16-C	<p data-bbox="763 284 853 309">Noted:</p> <p data-bbox="763 336 1924 472">There is no definition of Connection Configuration within Table 16-C, although there is for Shared Isolation. AGL suggest that the text be consistent with other fields (eg Previous Read Quality Flag) which defines permitted values, and the specification of those values be contained within the Standing Data for MSATS document.</p> <p data-bbox="763 496 1581 521">This could also apply to CT and VT information, Test information etc.</p> <p data-bbox="763 600 1917 695">AGL also notes that Connection Configuration is not available for the LR or MC. AGL believes that the greater benefit of this information lies with the MC and therefore should be available to the MC.</p> <p data-bbox="763 722 1861 786">AGL also believes that as the LR will be a function in embedded networks, AGL suggests that Connection Configuration include the LR.</p>

4. Proposed Changes in MSATS Procedures - WIGS

Please provide feedback to the changes highlighted in **yellow** in the change marked version of the document

Section No/Field Name - WIGS	Participant Comments
4.3.4(c)	<p>Noted.</p> <p>However, as the participant may not be responsible for some items of information, AGL suggests that the following sentence be amended:</p> <p style="padding-left: 40px;">Populate a Change Request with the following information as required:</p>
4.3.4(h)	<p>Noted.</p> <p>However, as the participant may not be responsible for some items of information, AGL suggests that the following sentence be amended:</p> <p style="padding-left: 40px;">Populate a Change Request with the following information as required:</p>
5.2.4(c)	Noted
5.2.4(d)	Noted
5.3.4(f)	Noted
5.4.4(f)	Noted
9.1.4(b)(iii)	Noted

5. Proposed Changes in Standing Data for MSATS Guideline

Please provide feedback to the changes highlighted in yellow in the change marked version of the document

Section No/Field Name - MSATS	Participant Comments
Table 3 CATS_METER_REGISTER	Noted
Table 6 CATS_NMI_DATA	Noted
Table 8 CATS_REGISTER_IDENTIFIER	Noted
Table 14	Noted
Table 15 Valid Meter Use Codes	<p>AGL notes that Solar/PV has been deleted from the available Valid Meter Codes. In the First Draft Determination (pp 46, 76) AEMO indicated that Solar/PV was to be a Required field.</p> <p>AGL does not support this deletion. The proposal to use 'Revenue' applies to most of the other meter types in Table 15 (Standing Data) such as TUOS, sample, prepaid and unmetered, which are all used to generate revenue.</p> <p>'Revenue' is the base case description and the other enumerations are provided to ensure participants have a clearer understanding of the usage associated with that meter. Further Solar/PV in particular is more than just a revenue meter as many customers receive income from the Solar component.</p> <p>Going forward, its likely we will also need a descriptor for Solar/Battery or just Battery to differentiate potential Demand Services at that NMI. Noting the recent SA gov consultation on Smarter homes, there may be a need to further identify Solar/PV – Controlled to separate uncontrolled Solar from controlled Solar.</p>

Section No/Field Name - MSATS	Participant Comments
Table 16 Valid Time of Day Codes	Noted AGL queries the meaning of the additional text against Interval and how it would be used with say Peak or Shoulder. Is it intended that Interval is used for flat tariff registers and that Peak, Shoulder etc would be used where a time of use tariff is applied.
Section 13	Noted
Table 43 CATS_Meter_Register	Noted
Table 46 CATS_NMI_Data	Noted Shared isolation flag character length 10 seems a lot for a 1-character flag; Two (2) characters would be adequate.
Table 49 CATS_Meter_Register	Noted
Table 52 CATS_NMI_Data	Noted

6. Proposed Changes in Metrology Procedure Part A

Please provide feedback to the ~~the~~ changes highlighted in yellow in the change marked version of the document

Section No/Field Name MetA	Participant Comments
14. SHARED FUSE ARRANGEMENTS	<p>AGL Notes the Proposed Changes In The Metrology Procedure (as required by the Rules0. However, see responses to CATS 2.2/2.3; AGL believes that what has been placed in the Metrology Procedures may not be adequate. Until there is clarity on how this process is to be managed, the obligations in the metrology procedures may be insufficient while the obligations in the CATS procedures may be overstated.</p> <p>AGL strongly suggests that some basic scenarios be reviewed at industry prior to these changes being finalised.</p>

7. Proposed Changes in Exemption Procedure Meter Installation Malfunctions

Please provide feedback to the ~~the~~ changes highlighted in yellow in the change marked version of the document

Section No/Field Name - Exempt	Participant Comments
1.1	Noted – No Comment
2.2	Noted – No Comment
Appendix A	Noted – No Comment
Appendix B	Noted – No Comment

8. Proposed Changes in Retail Electricity Market Procedures - Glossary and Framework

Please provide feedback to the ~~the~~ changes highlighted in yellow in the change marked version of the document

Section No/Field Name - Gloss	Participant Comments
5. GLOSSARY Shared Fuse Arrangement	AGL thinks that this definition is somewhat confusing and suggests something like: Shared Fuse Arrangement is where multiple NMIs being supplied via a common isolation point. This is specified in detail in Metrology Procedure: Part A and is recorded via an MSATS flag.

9. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Solar Smart Homes – SA	As noted in the meter types, if the SA government makes changes to the metering requirements) there may need to be further enumerations to define a controlled Solar / PV system from an uncontrolled Solar/PV system.