

27 July 2020



Ms Audrey Zibelman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Dear Ms Zibelman

Energy Queensland's feedback on the MSATS Standing Data Review Second Stage Draft Report

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the MSATS Standing Data Review Second Stage Draft Report.

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy);
- a regional service delivery retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- Affiliated contestable business, Yurika Pty Ltd including its subsidiary, Metering Dynamics Pty Ltd.

Energy Queensland's DNSPs, Energex and Ergon Energy, and its affiliated business, Metering Dynamics Pty Ltd, have provided comments against AEMO's template reflecting their participant role.

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 0467 782 350 or Barbara Neil on 0429 782 860.

Yours sincerely

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

Trudy Fraser
Manager Regulation

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Encl: Energy Queensland comments to consultation questions

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: MDYMC, MDYMP, MDYMDP, MDYENM,
Energex, Ergon Energy

Completion Date: 16 July 2020

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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)?	Metering Dynamics are comfortable that the CT ratios listed cover the LV CTs encountered in the NEM. For HV CT's we have found that there is a much larger range of ratios applied and no real standard ratios. Metering Dynamics has HV installations with over 120 different CT ratios (listing provided) and as such feel it may be more practicable to have an option of 'HV CT' in lieu of nominating a specific ratio where the installation is HV connected.

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	Participant Comments
2.2 (r)	We have no comment on this change.
2.2(s)	We have no comment on this change.
2.3(r)	Energex and Ergon Energy note that the changes do not indicate 'how' the information related to Shared Fuse Arrangements is to be provided to the LNSP. Energex's and Ergon Energy's preference is to receive this information via appropriate B2B transactions.
2.3(s)	Energex and Ergon Energy note that the changes do not indicate 'how' the information related to Shared Fuse Arrangements is to be provided to the LNSP. Energex's and Ergon Energy's preference is to receive this information via appropriate B2B transactions.
2.3(t)	Energex and Ergon Energy note that the changes do not indicate 'how' the information related to Shared Fuse Arrangements is to be provided to the LNSP. Energex's and Ergon Energy's preference is to receive this information via appropriate B2B transactions.
2.6(k)	<p>Metering Dynamics notes that to adhere to this change updates will be required to MP and MC processes and methods for provision of required details agreed between <u>the</u> MC and LNSP.</p> <p>Energex and Ergon Energy note that the changes do not indicate 'how' the information related to Shared Fuse Arrangements is to be provided to the LNSP. Energex's and Ergon Energy's preference is to receive this information via appropriate B2B transactions.</p>

Section No/Field Name	Participant Comments
2.6(l)	Metering Dynamics notes that to adhere to this change updates will be required to MP and MC processes and methods for provision of required details agreed between MC and LNSP.
2.9(k)	We have no comment on this change.
9.3.4(c)	We have no comment on this change.
9.3.4(e)	We have no comment on this change.
9.4.4(c)	We have no comment on this change.
9.4.4(d)	We have no comment on this change.
10.1.4(c)	Metering Dynamics notes that to adhere to this change updates will be required to MP processes and systems, in line with required MSATS schema changes.
10.1.4(e)	We have no comment on this change.
10.2.4(g)	Metering Dynamics notes that to adhere to this change updates will be required to MP processes and systems, in line with required MSATS schema changes.
10.3.4(h)	Metering Dynamics notes that to adhere to this change updates will be required to MP processes and systems, in line with required MSATS schema changes.
10.4.4(g)	Metering Dynamics notes that to adhere to this change updates will be required to MP processes and systems, in line with required MSATS schema changes.

Section No/Field Name	Participant Comments
10.5.4(g)	Metering Dynamics notes that to adhere to this change updates will be required to MP processes and systems, in line with required MSATS schema changes.
15.1.4(f)	We have no comment on this change.
Table 16-C	We have no comment on this change.

4. Proposed Changes in MSATS Procedures - WIGS

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

Section No/Field Name	Participant Comments
4.3.4(c)	We have no comment on this change.
4.3.4(h)	We have no comment on this change.
5.2.4(c)	Metering Dynamics notes that to adhere to this change updates will be required to MP processes and systems, in line with required MSATS schema changes.
5.2.4(d)	We have no comment on this change.
5.3.4(f)	We have no comment on this change.
5.4.4(f)	Metering Dynamics notes that to adhere to this change updates will be required to MP processes and systems, in line with required MSATS schema changes.
9.1.4(b)(iii)	We have no comment on this change.

5. Proposed Changes in Standing Data for MSATS Guideline

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

Section No/Field Name	Participant Comments
Table 3 CATS_METER_REGISTER	<p>Energex and Ergon Energy would like confirmation of the definition of interval meter where referenced in the GPSCoordinatesLat and GPSCoordinatesLong fields, i.e. does the concept of interval include Streetlight and NCONMUL NMIs?</p> <p>Energex and Ergon Energy note that the new value of D for ReadTypeCode field in the CATS_METER_REGISTER table does not represent the purpose of the field. Energex and Ergon Energy believe that if a meter cannot be converted then it should remain as value B -15min or C-30min.</p> <p>Energex and Ergon Energy would like confirmation on the definition of “BLOCK methodology” in NextScheduledReadDate where the forward estimate process is used.</p>
Table 6 CATS_NMI_DATA	We have no comment on this change.
Table 8 CATS_REGISTER_IDENTIFIER	We have no comment on this change.
Table 15 Valid Meter Use Codes	We have no comment on this change.
Table 16 Valid Time of Day Codes	We have no comment on this change.
Section 13	We have no comment on this change.
Table 43 CATS_Meter_Register	We have no comment on this change.
Table 46 CATS_NMI_Data	We have no comment on this change.

Section No/Field Name	Participant Comments
Table 49 CATS_Meter_Register	We have no comment on this change.
Table 52 CATS_NMI_Data	We have no comment on this change.

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	Participant Comments
14. SHARED FUSE ARRANGEMENTS	We have no comment on this change.

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	Participant Comments
1.1	We have no comment on this change.
2.2	We have no comment on this change.

Section No/Field Name	Participant Comments
Appendix A	We have no comment on this change.
Appendix B	We have no comment on this change.

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	Participant Comments
5. GLOSSARY Shared Fuse Arrangement	Energex and Ergon Energy note that the definition of Shared Fuse Arrangement indicates it can be at a connection point or at the meter while Metrology Procedures: Part A, section 14 (a-c) indicates it is only related to the connection point. Energex and Ergon Energy suggest the definition is updated to remove the reference to 'at the meter'.

9. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
	We have no further comments.