

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: PLUS ES

Completion Date: 27 Jul 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)? | <p>PLUS ES seeks clarification on what the continuum process would be once these enumerations are implemented.</p> <p>How would the introduction of new enumerations be included in the existing list and how validations would be applied until the new fields were introduced?</p> <p>The more complex the scenarios and combinations – which belong in MC/MPB asset management systems – the greater the potential to cause data validation issues.</p> <p>For the above reasons and the mitigation of potential complexity, PLUS ES recommends</p> |

| Information Category | Question No. | Question | Participant Comments |
|-----------------------------|---------------------|-----------------|--|
| | | | that an 80-20 or 90-10 rule is applied and then a field is allowed for the 'exception' cases. Participants can always follow up with the MPB for further details. At least, with this option the bulk of the administrative effort has been mitigated. |

3. Proposed Changes in MSATS Procedures – CATS

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

| Section No/Field Name | Participant Comments |
|-----------------------|--|
| 2.2 (r) | <p>As per AEMO's assessment in the draft report and determination:</p> <p><i>AEMO notes the majority preference for the use of B2B transactions. AEMO intends to collate the relevant feedback and provide this to the IEC. This communications solution is outside MSATS, so will be not be delivered as part of this MS DR consultation.</i></p> <p>PLUS ES proposes that this clause is then removed from the CATS procedures and captured in the metrology procedure as part of a process and/or in the appropriate B2B procedure document.</p> |
| 2.2(s) | <p>As per AEMO's assessment in the draft report and determination:</p> <p><i>AEMO notes the majority preference for the use of B2B transactions. AEMO intends to collate the relevant feedback and provide this to the IEC. This communications solution is outside MSATS, so will be not be delivered as part of this MS DR consultation.</i></p> <p>PLUS ES proposes that this clause is then removed from the CATS procedures and captured more relevantly in the metrology procedure as part of a process and/or in the appropriate B2B procedure document.</p> |
| 2.3(r) | |

| Section No/Field Name | Participant Comments |
|-----------------------|--|
| 2.3(s) | |
| 2.3(t) | |
| 2.6(k) | <p>As per AEMO's assessment in the draft report and determination:</p> <p><i>AEMO notes the majority preference for the use of B2B transactions. AEMO intends to collate the relevant feedback and provide this to the IEC. This communications solution is outside MSATS, so will be not be delivered as part of this MS DR consultation.</i></p> <p>PLUS ES proposes that this clause is then removed from the CATS procedures and captured in the metrology procedure as part of a process and/or in the appropriate B2B procedure document.</p> |
| 2.6(l) | <p>As per AEMO's assessment in the draft report and determination:</p> <p><i>AEMO notes the majority preference for the use of B2B transactions. AEMO intends to collate the relevant feedback and provide this to the IEC. This communications solution is outside MSATS, so will be not be delivered as part of this MS DR consultation.</i></p> <p>PLUS ES proposes that this clause is then removed from the CATS procedures and captured in the metrology procedure as part of a process and/or in the appropriate B2B procedure document.</p> |
| 2.9(k) | |

| Section No/Field Name | Participant Comments |
|-----------------------|--|
| 9.3.4(c) | |
| 9.3.4(e) | |
| 9.4.4(c) | |
| 9.4.4(d) | |
| 10.1.4(c) | |
| 10.1.4(e) | |
| 10.2.4(g) | |
| 10.3.4(h) | |
| 10.4.4(g) | <p>Possible misalignment:</p> <p>CR3080, CR3081 have an initiating role of the MC</p> <p>NMI Standing Data document does not have the MC as a party to provide against most the fields included in these CRs .</p> |
| 10.5.4(g) | <p>Possible misalignment:</p> <p>CR3090, CR3091 have an initiating role of the MC</p> |

| Section No/Field Name | Participant Comments |
|---|--|
| | NMI Standing Data document does not have the MC as a party to provide against most the fields included in these CRs . |
| 15.1.4(f) | |
| Table 16-C | <ul style="list-style-type: none">• For completion: Connection Configuration should be discoverable for the MC in the NMI Discovery |
| Comments for non-yellow highlighted fields | |
| Section 2.9 | AEMO will be populating the following fields but they have not been included in the AEMO obligations of section 2.9: <ul style="list-style-type: none">• MeterMalfunctionExemptionNumber• MeterMalfunctionExemptionExpiryDate |
| 9.3.4(c) | <ul style="list-style-type: none">• Bullet point numbering sequence incorrect. (a) (b) (c) have been duplicated• Space between i and t in Nominate itself as the New LNSP |

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 | Participant Comments |
|-----------------------|----------------------|
| 4.3.4(c) | |
| 4.3.4(h) | |
| 5.2.4(c) | |
| 5.2.4(d) | |
| 5.3.4(f) | |
| 5.4.4(f) | |
| 9.1.4(b)(iii) | |

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 | Participant Comments |
|--------------------------------|---|--|
| Table 3 CATS_METER_REGISTER | GPSCoordinatesLat GPSCoordinatesLong | <p>The definition was not updated to align with the draft determination.</p> <p>To be applied to all NMIs – Transition period for 36 months</p> <p>PLUS ES supports the overall objective in introducing this field as it will deliver value. We also support the mandatory requirement to provide the GPS coordinates in the following instances:</p> <ul style="list-style-type: none"> • New metering installations (install new meter/meter exchange) • Every time a site/meter installation is visited irrespective of the purpose. For example, <ul style="list-style-type: none"> ○ Meter Investigation ○ Meter Testing ○ Manual Meter Reading ○ Local disconnection/reconnection etc. <p>PLUS ES strongly disagrees with requirements which would mandate a participant to undertake a costly exercise purely for providing GPS co-ordinates in MSATS, even more so when a field visit would be required only for the purpose of obtaining the coordinates. The cost versus benefits analysis alone would be prohibitive especially when the likelihood of the meter churning to another provider would be extremely low. Any benefits realised would be nullified.</p> |

| | | |
|--------------------------|-----------------------------|--|
| | | <p>In cases, where regular frequent visits are not required to the metering installation, i.e. remote enabled, there is the additional burden of deploying resources to support this requirement. Resources employed specifically for this purpose or redeployed from their current BAU tasks causing upstream/downstream impacts to the operational arm of the business. This could potentially impact other industry determined deliverables and timeframes in addition to the financial burden.</p> <p>Overall though PLUS ES recommends that a cost benefits analysis is undertaken across the industry to determine if the GPS co-ordinate fields at the metering installation would mitigate unlocatable meters. Things to consider:</p> <ul style="list-style-type: none"> • what would be the success rate (accuracy/availability)? • how large is the current issue (volumes/costs)? • cost of implementing and meeting the mandate and • are there other more cost-effective alternatives in getting the information, i.e. asking the customer about the meter location? |
| Table 6 CATS_NMI_DATA | Connection Configuration | |
| | GNAFPID | <p>The conversation was generally for AEMO to populate this field.</p> <ul style="list-style-type: none"> • PLUS ES has noted that CRs which the LNSP and/or ENM raise have these fields included to be populated, as applicable. The response in the draft report is that it will be required and LNSP to provide if the they have this information. • If it remains as applicable for the ENM, should this also be indicated in the 'party to provide'. |

| | | |
|---|-----------|--|
| Table 8 CATS_REGISTER_IDE NTIFIER | | |
| Table 15 Valid Meter Use Codes | UNMETERED | PLUS ES understanding is that UNMETERED is a type of meter supply, not a use of a meter. It also believes that the use of unmetered would still fall into existing enumerations available such as REVENUE, etc. The draft report nor AEMO responses provided clarification for the addition of this value. |
| Table 16 Valid Time of Day Codes | | |
| Section 13 | | |
| Table 43 CATS_Meter_Register | | |
| Table 46 CATS_NMI_Data | | |
| Table 49 CATS_Meter_Register | | |
| Table 52 CATS_NMI_Data | | |
| Comments for non-yellow highlighted sections | | |

| | | |
|----------------|--|--|
| Contents Table | | Table 49 – Error! Book mark not defined |
| Enumerations | | PLUS ES supports a consistent and standard way of providing information in MSATS, to drive efficiencies across the Market. Consideration must be given to existing or proposed enumerations to avoid introducing additional data records which are available or can be deduced from other existing fields. |

6. Proposed Changes in Metrology Procedure Part A

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

| Section No/Field Name | Participant Comments |
|------------------------------|--|
| 14. SHARED FUSE ARRANGEMENTS | Additional comments provided in Section 9 of the paper for Shared Fuse Arrangements. |

7. Proposed Changes in Exemption Procedure Meter Installation Malfunctions

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

| Section No/Field Name | Participant Comments |
|-----------------------|----------------------|
| 1.1 | |
| 2.2 | |
| Appendix A | |

| Section No/Field Name | Participant Comments |
|-----------------------|----------------------|
| Appendix B | |

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

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

| Section No/Field Name | Participant Comments |
|--|---|
| 5. GLOSSARY Shared Fuse Arrangement | Current drafting: Shared Fuse Arrangement is covered by the Shared Point Isolation Flag in MSATS which can be at a connection point or at the meter . <ul style="list-style-type: none">• Meter should be metering installation• Definition should perhaps explain what a shared fuse arrangement is. i.e. isolation point of supply shared with more than one NMI etc |

9. Other Issues Related to Consultation Subject Matter

| Heading | Participant Comments |
|--------------------------|---|
| Shared fuse arrangements | <p>PLUS ES supports the changes drafted to meet the requirements of the NER rules recently implemented for shared isolation points.</p> <p>PLUS ES further recommends figure 2 below to be considered as an additional proposal to the current draft. Capturing the additional link between the shared isolation point and the directly impacted meters would drive further efficiencies across Retailers, MCs and DNSPs, such as but not limited to:</p> <ul style="list-style-type: none">• a reduction of costs: avoid unnecessary visits to sites, communications to customers which are not impacted by the planned interruption• streamlined utilisation of resources, better management and compliance to timeframes• better outcome for customers, irrespective if they are the requesting party for the metering installation or just an impacted consumer of the planned interruption. <p>The NER does discuss shared fuse arrangements and figure 2 is a depiction of existing valid shared fuse arrangements.</p> |

Figure 1 Current drafted Shared Isolation fields

Present Proposed AEMO flags

Initial State – LNSP doesn't know isolation arrangement
Flag bulk populated U

First Installation – MP visits site, identifies Shared isolation, Network isolation, Network visits site, identifies affected customers, network isolation organised, smart meter installed with individual isolation

Second **& subsequent** Installations MP/FRMP automatically requests Network Isolation, **Network visits site every time for Reconnaissance to identify affected customers**, network isolation organised, smart meter installed with Individual isolation

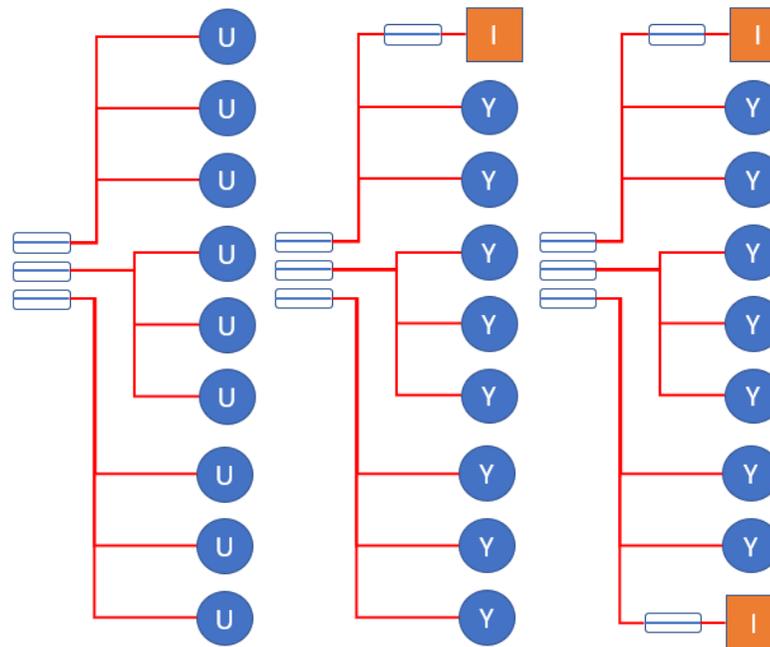


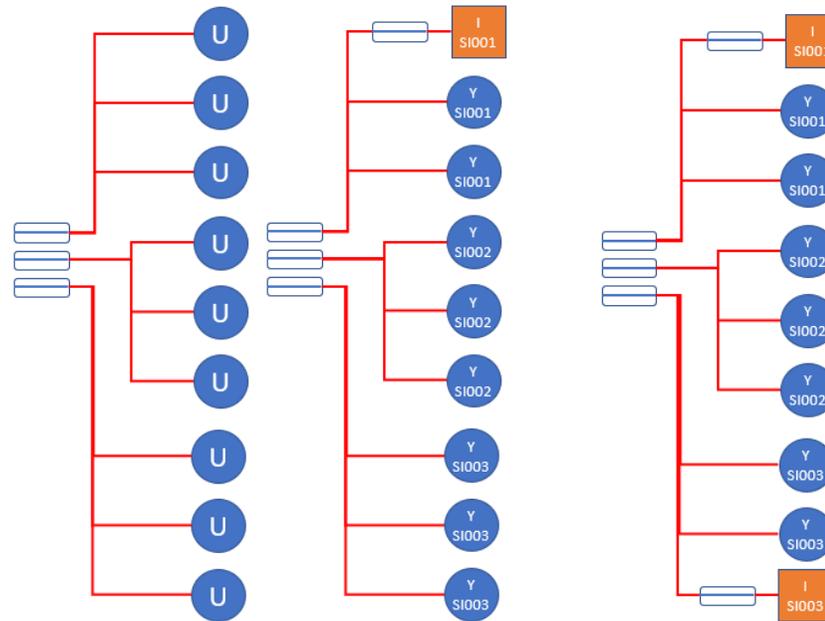
Figure 2: Alternative Proposal

Alternative

Initial State – LNSP doesn't know isolation arrangement Flag bulk populated U

First Installation – MP visits site, identifies Shared isolation, Network visits site, identifies affected customers, network isolation organised, smart meter installed with individual isolation. All sites identified.

Second and subsequent isolation MP can see from Flag and Index that Network Isolation required Network. **Network does not need to visit site to do reconnaissance, appointment set only for customers connected to SI003 Shared Isolation**



| Heading | Participant Comments |
|------------------|--|
| General comments | For convenience, AEMO to consider repeating the header row of the table on the top of each page, where the table breaks across pages. Especially, where the table contains numerous columns. It makes it difficult for the end user to follow efficiently. |