

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: Vector Metering

Completion Date: 27 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)?	

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)	<p>We note that rule change related to shared fusing requires AEMO to update the Metrology procedures so that DNSP's are required to capture Shared fuse information and that other participants are required to advise the DNSP of the presence of Shared fuse arrangements <i>as soon as practical</i>.</p> <p>We query</p> <ul style="list-style-type: none">• why is this clause in the CATS procedures? Shouldn't it be in the Met. Procedure?• Industry preference is for a B2B solution as the means for notification of Share fusing arrangements to the DNSP. It is premature to discuss obligations regarding timeliness until that process has been determined. At this point where this is no agreed process two days appears to be more onerous than 'as soon as practical'. <p>Note: It is unlikely that the FRMP will become aware of a shared fuse at a site independently of the MPB who attended the site. For efficiency, any obligation added to the metrology procedure should allow for the MPB to notify the LNSP directly.</p>

Section No/Field Name	Participant Comments
2.2(s)	<p>We note that rule change related to shared fusing requires AEMO to update the Metrology procedures so that DNSP's are required to capture Shared fuse information and that other participants are required to advise the DNSP of the presence of Shared fuse arrangements <i>as soon as practical</i>.</p> <p>We query</p> <ul style="list-style-type: none">• why is this clause in the CATS procedures? Shouldn't it be in the Met. Procedure?• Industry preference is for a B2B solution as the means for notification of Share fusing arrangements to the DNSP. It is premature to discuss obligations regarding timeliness until that process has been determined. At this point where this is no agreed process two days appears to be more onerous than 'as soon as practical'. <p>Note: It is unlikely that the FRMP will become aware of a shared fuse at a site independently of the MPB who attended the site. For efficiency, any obligation added to the metrology procedure should allow for the MPB to notify the LNSP directly.</p>
2.3(r)	<p>We do not believe there is a need to differentiate between NMI's are part of a shared fuse installation but can be isolated ('I') and NMI's that are not on a shared fuse ('N'). Both these Meters are not subject to shared fusing requirements and will be treated the same. Vector recommends values should be 'S'hared fusing,'I'solated fusing and 'U'nknown;</p>
2.3(s)	See 2.3(r)

Section No/Field Name	Participant Comments
2.3(t)	See 2.3(r). We recommend values should be 'S','I','U'.
2.6(k)	<p>We note that rule change related to shared fusing requires AEMO to update the Metrology procedures so that DNSP's are required to capture Shared fuse information and that other participants are required to advise the DNSP of the presence of Shared fuse arrangements <i>as soon as practical</i>.</p> <p>We query</p> <ul style="list-style-type: none">• why is this clause in the CATS procedures? Shouldn't it be in the Met. Procedure?• Industry preference is for a B2B solution as the means for notification of Share fusing arrangements to the DNSP. It is premature to discuss obligations regarding timeliness until that process has been determined. At this point where this is no agreed process two days appears to be more onerous than 'as soon as practical'. <p>Note: It is unlikely that the MC will become aware of a shared fuse at a site independently of the MPB who attended the site. For efficiency, any obligation added to the metrology procedure should allow for the MPB to notify the LNSP directly.</p>
2.6(l)	<p>We note that rule change related to shared fusing requires AEMO to update the Metrology procedures so that DNSP's are required to capture Shared fuse information and that other participants are required to advise the DNSP of the presence of Shared fuse arrangements <i>as soon as practical</i>.</p> <p>We query</p> <ul style="list-style-type: none">• why is this clause in the CATS procedures? Shouldn't it be in the Met. Procedure?

Section No/Field Name	Participant Comments
	<ul style="list-style-type: none"><li data-bbox="817 279 1924 422">• Industry preference is for a B2B solution to be established as the means for notification to the DNSP. It is premature to discuss obligations regarding timeliness until that process has been determined. At this point where this is no agreed process two days appears to be more onerous than 'as soon as practical'. <p data-bbox="763 502 1915 614">Note: It is unlikely that the MC will become aware of a shared fuse at a site independently of the MPB who attended the site. For efficiency, any obligation added to the metrology procedure should allow for the MPB to notify the LNSP directly.</p>
10.1.4(c)	<p data-bbox="763 651 1915 726">GPS Coordinates have a transition period of 36 months so these fields cannot be mandatory and should be in 10.1.4(e) until the transition period expires.</p> <p data-bbox="763 758 1892 869">Note: MPB may not have put the required changes into their field devices and systems and processes by the effective date of the procedures so will need to update msats later but within the 36 months...</p>
Table 16-C	<p data-bbox="763 909 1892 981">Unclear why ConnectionConfiguration is not available in NMI discovery. This is quite important information as it indicates whether a connection is HV/LV.</p>

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

5. Proposed Changes in Standing Data for MSATS Guideline

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Section No/Field Name	Participant Comments
Table 3 CATS_METER_REGISTER	<p>Do not agree that GPSCoordinates should be mandatory for all meters after 36 months. This is applying a retrospective regulation. MC's who have installed remotely read meters prior to the effective date and did not record GPS location will be required to revisit that site just to collect this data. A reasonable cost for a contestable MC to revisit these sites would be \$80-\$100 per NMI. The benefits of revisiting the site to capture this data are unlikely to outweigh this cost. This will be passed on to consumers.</p> <p>Vector recommends that provision of GPS location should be Required, not Mandatory and that from the effective date of the procedures the MC/MPB/MDP should be required to ensure that GPS location is captured when the site is attended for any reason (meter investigations, manual meter read, adds & alts). This will effectively make it mandatory for new meters going forward, and over time all other meters will be captured.</p>
Table 3 CATS_METER_REGISTER	<p>Read type code – Do not agree with fourth character 'D'. If a 30 minute meter is unable to be converted to 5 minutes for any reason (including de-energisation) its fourth character read type code will remain at 'C – 30 minute'. 'D' is redundant.</p>

Section No/Field Name	Participant Comments
Table 6 CATS_NMI_DATA	<p>SharedIsolationPointFlag - do not believe there is a need to differentiate between NMI's are part of a shared fuse installation but can be isolated ('I') and NMI's that are not on a shared fuse ('N'). Both these Meters are not subject to shared fusing requirements and will be treated the same. Vector recommends values should be 'S'hared fusing,'I'solated fusing and 'U'nknown;</p> <p>Also recommend field be called 'IsolationPointFlag'.</p>
Table 32 CATS_Meter_Register	This is a Interval meter. TimeOfDay should be 'INTERVAL not 'ALLDAY'.

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	<p>There is no need to differentiate between NMI's are part of a shared fuse installation but can be isolated ('I') and NMI's that are not on a shared fuse ('N'). Both these Meters are not subject to shared fusing requirements and will be treated the same. Vector recommends values should be 'S'hared fusing,'I'solated fusing and 'U'nknown;</p>

Section No/Field Name	Participant Comments
	Diagram 4 is unnecessary.

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

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	Suggest the following definition. Shared Fuse Arrangement indicates whether a connection point can be physically deenergised without impacting supply at any other connection point.

9. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
<p>Notification of effective date of procedures.</p>	<p>Vector believes the changes proposed in this consultation represent a material impact on participants existing IT systems and processes. Some of these changes impact field tools used by meter technicians which will need to be enhanced by Vendors to capture new information E.g. GPS locations, Connection configuration etc. Back office processes and data repositories will need to be enhanced to support the new data collected and participant systems will need to generate and consume changes to over 20 CATS CRs and notifications, in addition to enhanced NMI discovery and CATS reports (C4, C7 etc) transactions. Participants will also be required to potentially build one-off processes to update MSATS in bulk. A change of this magnitude requires more than 8 months' notice of effective date. Vector recommends at least 15 months should be given.</p>