



21 December 2021

Daniel Westerman  
Chief Executive Officer and Managing Director  
Australian Energy Market Operator  
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Melbourne VIC 3001

NEM.Retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

### **Consultation - Retail Electricity Market Procedures Consultation**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to Australian Energy Market Operator (AEMO) in response to the Retail Electricity Market Procedures Consultation (second stage).

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

- Distribution network service providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Ergon Energy, Energex and Yurika Metering have provided responses to the questions raised in the Issues Paper in the attached response template. Should AEMO require additional information or wish to discuss any aspect of this submission, please contact either myself, on 0409 239 883 or Laura Males on 0429 954 346.

Yours sincerely

*Sarah Williamson*

Sarah Williamson  
**Acting Manager Regulation**

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**Encl:** Energy Queensland comments to consultation questions

# RETAIL ELECTRICITY MARKET PROCEDURES October 2021 CONSULTATION

## PROCEDURE CONSULTATION

## SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Ergon Energy, Energex and Yurika Metering

***Submission Date:*** 21 December 2021

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## 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the Retail Electricity Market Procedures October 2021 consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO’s Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

## 2. Questions on proposed changes

Heading	Participant Comments
Does your organisation support the proposals contained in the Issues Paper? If not, please specify areas in which your organisation disputes AEMO’s assessment (include ICF reference number) of the proposal and include information that supports your rationale why you do not support AEMO’s assessment.	Energy Queensland provides no comment.
Are there better options to accommodate the change proposals that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?	Energy Queensland provides no comment.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Energy Queensland provides no comment.
Do you have any further questions or comments in relation to the proposals described above?	Energy Queensland provides no comment.
Does your organisation have any feedback / suggestions that closely relates to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please include your feedback / suggestions. Please note that this feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process.	Energy Queensland provides no comment.

### 3. Feedback on proposed amendments

Document	Participant Comments
B2B E-Hub Participant Accreditation and Revocation Process (CIP_045 B2B E-Hub Participant Accreditation Procedure Clarification)	Energy Queensland supports the effective date of CIP_045 being brought forward to 1 May 2022.
Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications)	Energy Queensland supports the changes and all identified impacts are being address as part of a current project within our business.
Meter Data File Format Specification (MDFF) NEM12 & NEM13 (CIP_042 Reason Code)	Energy Queensland supports the effective date of CIP_042 being brought forward to 1 May 2022.
Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044)	Energy Queensland supports the effective date of CIO_046 being brought forward to 1 May 2022.
Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard and Connection Configuration Clarification)	<p>Energy Queensland supports the delay to 7 November 2022, although suggest the B2B schema should be addressed to support the new Controlled Load field enumerations, as stated in the <i>AEMO MSDR Final Report</i> – (p32) Excerpt related to Controlled Load is – ‘Field to have a common enumerated list for both B2B and B2M, as detailed below, Table 5.’</p> <p>In relation to AEMO’s conclusion (section 3.7.3), the minimum decimal place requirement does not appear to be reflected in <i>Table 4 - CATS Meter Register – Browser Cross Reference</i> within the “Standing data for MSATS” document. Energy Queensland seeks clarification if the aseXML will not force a 7 decimal (s2.7) and (s3.7) i.e. aseXML will accept 5 decimal, 6 decimal and 7 decimal.</p> <p>Energy Queensland notes the 5-7 decimal format is correctly noted in <i>Table 3 - CATS Meter Register – Field Definitions</i>.</p>

Document	Participant Comments
	And further, we agree that the minimum latitude should be a negative value "-99.9999999.

#### 4. Feedback on consolidations

Document	Version(s)	Clause	Participant Comments
CATS			Energy Queensland provides no comment.
WIGS			Energy Queensland provides no comment.
Metrology Part A			Energy Queensland provides no comment.
Metrology Part B			Energy Queensland provides no comment.
MSATS Procedures: MDM Procedures			Energy Queensland provides no comment.
NEM RoLR Processes Part A and Part B			Energy Queensland provides no comment.
(Glossary and Framework			Energy Queensland provides no comment.
Standing Data document			Energy Queensland provides no comment.

## 5. MDFF NEM12 & NEM13

Section	Description	Participant Comments
		Energy Queensland provides no comment.

## 6. B2B E-Hub Participant Accreditation and Revocation Process

Section	Description	Participant Comments
		Energy Queensland provides no comment.

## 7. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)

Section	Description	Participant Comments
		Energy Queensland provides no comment.

## 8. Standing Data document

Section	Description	Participant Comments
11 Table 30	No alignment with NOMW for Controlled Load values	Energy Queensland notes the three new Controlled Load values (CIP_049) of YES, NO and EXT in MSATS Standing Data, do not align with the allowable values ("Yes" or "No") in the NOMW-OWN for the ControlledLoad field. Energy queensland seeks clarity as to whether there are plans to update the NOMW to align with the market.

Section	Description	Participant Comments
4.1 Table 3	GPS Co-Ordinate validation	Regarding the GPS co-ordinates (CIP_053), Energy Queensland notes will there be a validation that will not allow a lower number of decimal to over-ride a higher number of decimal (eg. 5 or 6 decimals vs 7 decimals) but always allow higher decimals to override lower or the same number of decimals (eg. 7 decimals vs 5 or 6 decimals). We suggest the lower the granularity (that is higher number of decimals) should always be preferred.

### 9. MSATS Procedures: MSATS Procedures: CATS

Section	Description	Participant Comments
		Energy Queensland provides no comment.

### 10. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS)

Section	Description	Participant Comments
		Energy Queensland provides no comment.



**11. Metrology Procedure: Part B - National Electricity Market (Metrology Procedure: Part B)**

Section	Description	Participant Comments
		Energy Queensland provides no comment.

**12. MSATS Procedures: (Meter Data Management) MDM Procedures**

Section	Description	Participant Comments
		Energy Queensland provides no comment.

**13. NEM RoLR Processes Part A and Part B**

Section	Description	Participant Comments
		Energy Queensland provides no comment.

**14. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)**

Section	Description	Participant Comments
		Energy Queensland provides no comment.