

15 November 2021



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

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Dear Mr Westerman

**Energy Queensland submission to the 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.

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 Barbara Neil on 0429 782 860.

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

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

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

***Submission Date:** 15 November 2021*

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## 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial 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.	We support the changes in this Issues Paper.
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?	We have no other suggested options.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	We suggest the main challenges with adopting these changes include the costs to implement; business and vendor resources for development; and balancing changes occurring in parallel with other consultation packages.
Do you have any further questions or comments in relation to the proposals described above?	We would like clarity on the implications on this package of any delays to MSATS Standing Data or Metering Coordinator Planned

Heading	Participant Comments
	Interruptions. For example, could these changes progress independently of other consultations?
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.	We have no futher comments.

### 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)	We support this process.
Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications)	We support these changes and all identified impacts are currently being addressed.
Meter Data File Format Specification (MDFF) NEM12 & NEM13 (CIP_042 Reason Code)	We support these changes.

Document	Participant Comments
Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044)	Please refer to our specific comment regarding 'Shared Fuse Arrangements' in Section 7 below.
Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard)	We support these changes and all identified impacts are currently being addressed.

#### 4. Feedback on consolidations

Document	Clause	Participant Comments
CATS		We support the version consolidations.
WIGS		We have no further comments.
Metrology Part A		We support the version consolidations.
Metrology Part B		We support the version consolidations.
MSATS Procedures: MDM Procedures		We support the version consolidations.
NEM RoLR Processes Part A and Part B		We have no further comments.
Retail Electricity Market Procedures – Glossary and Framework (Glossary and Framework)		We have no further comments.

Document	Clause	Participant Comments
Standing Data document		While we support the version consolidation, we found some changes difficult to understand as some of the marked up changes were already in the previous version that pertained to the March 2021 Retailer Electricity Market Procedures consolidation.

### 5. MDFF NEM12 & NEM13

Section	Description	Participant Comments
		We have no comments.

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

Section	Description	Participant Comments
		We have no comments.

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

Section	Description	Participant Comments
14	<p>Shared Fuse Arrangements</p> <p>a) Local network Service Providers (LNSPs) must identify, record, and maintain Shared Fuse Arrangements through the Shared Isolation Point Flag in MSATS for every connection point that is part of each specific Shared Fuse Arrangement, as specified in the NER and the MSATS Procedures.</p> <p>b) Financially Responsible Market Participants (FRMPs) and Metering Coordinators (MCs) must notify the Local Network Service Providers (LNSPs) of any new Shared Fuse Arrangements or any changes to existing Shared Fuse Arrangements for the connection points relevant to them, as specified in the NER and the MSATS Procedures.</p> <p>c) Metering Provider Category B (MPB) must notify the MC or the FRMP of any new Shared Fuse Arrangements or any changes to existing Shared Fuse Arrangements for the connection points relevant to them, as specified in the MSATS Procedures.</p> <p>d) Participants may access existing connection points' Shared Fuse Arrangements information that is available in the MSATS Standing Data as specified in the MSATS Procedures. Shared Fuse Arrangements for connection points are stored in the</p>	<p>We note diagrams 1 to 4 reference 'Meter' as opposed to 'NMI', as:</p> <ol style="list-style-type: none"> <li>1) a NMI can have one or more meters</li> <li>2) the Shared Isolation Point Flag is a NMI level flag.</li> </ol> <p>We request an update to diagrams 1-4 to display 'NMI X' instead of 'Meter X'.</p>

Section	Description	Participant Comments
	<p>Shared Isolation Point Flag field in MSATS which is discoverable via NMI Discovery in MSATS.</p> <p>e) The following diagrams show the correct use of Shared Fuse Isolation Point Flags:</p> <p>Go to the Metrology Procedure: Part A to access the diagrams.</p>	

### 8. Standing Data document

Section	Description	Participant Comments
		<p>We support these changes and all identified impacts are currently being addressed.</p>

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

Section	Description	Participant Comments
		<p>We support these changes and all identified impacts are currently being addressed.</p>

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

Section	Description	Participant Comments
		We have no comments.

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

Section	Description	Participant Comments
		We support the version consolidation and have no identified amendments.

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

Section	Description	Participant Comments
		We support the version consolidation and have no identified amendments.

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

Section	Description	Participant Comments
		We have no comments.

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

Section	Description	Participant Comments
		We support the version consolidation and have no identified amendments.