

# RETAIL ELECTRICITY MARKET PROCEDURES OCTOBER 2021 CONSULTATION

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant: PLUS ES***

***Submission Date: 15 Nov 2021***

## Table of Contents

1. Context .....	3
2. Questions on proposed changes .....	3
3. Feedback on proposed amendments .....	4
4. Feedback on consolidations .....	5
5. Meter Data File Format Specification (MDFF) NEM12 & NEM13 .....	10
6. B2B E-Hub Participant Accreditation and Revocation Process .....	10
7. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A) .....	11
8. Standing Data for MSATS (Standing Data document) .....	11
9. MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) .....	11
10. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS) .....	11
11. Metrology Procedure: Part B - National Electricity Market (Metrology Procedure: Part B).....	12
12. MSATS Procedures: (Meter Data Management) MDM Procedures .....	12
13. NEM RoLR Processes Part A and Part B.....	12
14. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework) .....	12

## 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.	PLUS ES supports the proposals with a few comments noted below.
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?	N/a
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	N/a
Do you have any further questions or comments in relation to the proposals described above?	N/a
Does your organisation have any feedback / suggestions that closely relates to the scope or impacts this consultation, but the nature of the feedback /	

Heading	Participant Comments
<p>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.</p>	

### 3. Feedback on proposed amendments

Document	Participant Comments
<p>B2B E-Hub Participant Accreditation and Revocation Process (CIP_045 B2B E-Hub Participant Accreditation Procedure Clarification)</p>	
<p>Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications)</p>	
<p>Meter Data File Format Specification (MDFF) NEM12 &amp; NEM13 (CIP_042 Reason Code)</p>	
<p>Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044)</p>	<p>Metrology Part A Clause 12.5 Title –  Clauses 4.2(a)(iii) and 4.2(b) of the Metering Provider Service Level Procedures (MP SLP) cater for whole current small</p>

Document	Participant Comments
	<p>customer metering installations and manually read metering installations.</p> <p>Manually read installations would include CT manually read metering.</p> <p>The current amended wording of Metrology Part A 12.5 '<i>for small customers</i>' effectively exclude <i>manually read</i> CT metering and does not resolve the inconsistency with MDP SLP Clause 4.2(b).</p>
<p>Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard)</p>	<p>Controlled Load Enumerations –</p> <p>PLUS ES recommends the definitions of YES and EXT be further clarified/simplified to indicate that YES is controlled <b>internally by the meter</b>. Additionally, the controlled load may or may not be associated with a network controlled load tariff; for example, SAPN TOU tariff.</p>

#### 4. Feedback on consolidations

Document	Clause	Participant Comments
CATS	V5.1 Clause 4.4	Clause 4.4. (b) was captured in v4.94 and has not been included in v5.1.

Document	Clause	Participant Comments
		<p><b>4.4. NMI Classification</b></p> <p>(a) The NMI Classification Codes 'LARGE' and 'SMALL' are used in these Procedures. They are parameters for defining Change Reason Codes, application timeframes and Objection Rules.</p> <p>(b) The NMI Classification Codes 'LARGE' and 'SMALL' are based on the total annual load of the NMI as per Table 4-D.</p> <p>The changes in the NMI Classification Table made in v4.94 have not been included in v5.1. For example,</p> <ul style="list-style-type: none"> <li>• Small NMI and the associated definition of business and residential customers</li> <li>• Large NMI and the added parameter of business customer.</li> </ul> <p><u>XBOUNDRY</u> <i>Connection point where a distribution network connects to another to distribution network</i> <u>AllAll</u></p> <p>Typo: The 'to' from '...another <b>to</b> distribution network' in the above XBOUNDRY definition should be removed.</p>
	Section 13.3.6 – CR 6300/01 Objection Rules	The following changes were captured - Objection Rules for CR6300 and CR6301 v4.94 - and have not been included in v5.11.

Document	Clause	Participant Comments																																																																																																																																																																										
		<p>CR 6300 – Change MC</p> <table border="1"> <thead> <tr> <th rowspan="2">Objection Code</th> <th rowspan="2">NMI Class</th> <th rowspan="2">Jur'n</th> <th colspan="2">FRMP</th> <th colspan="2">LR</th> <th colspan="2">MDP</th> <th colspan="2">MPB</th> <th colspan="2">RoLR</th> <th colspan="2">RP</th> <th colspan="2">LNSP</th> </tr> <tr> <th>N</th> <th>C</th> </tr> </thead> <tbody> <tr> <td>CONTRACT</td> <td>LARGE</td> <td>ALL</td> <td>-</td> <td>Yes</td> <td>-</td> <td>-</td> </tr> <tr> <td>DECLINED</td> <td>ALL</td> <td>ALL</td> <td>-</td> <td>Yes</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>BADPARTY</td> <td>SMALL</td> <td>VIC</td> <td></td> <td>Yes</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>CR 6301 – Change MC – Retrospective</p> <table border="1"> <thead> <tr> <th rowspan="2">Objection Code</th> <th rowspan="2">NMI Class</th> <th rowspan="2">Jur'n</th> <th colspan="2">FRMP</th> <th colspan="2">LR</th> <th colspan="2">MDP</th> <th colspan="2">MPB</th> <th colspan="2">RoLR</th> <th colspan="2">RP</th> <th colspan="2">LNSP</th> </tr> <tr> <th>N</th> <th>C</th> </tr> </thead> <tbody> <tr> <td>DECLINED</td> <td>ALL</td> <td>ALL</td> <td>-</td> <td>Yes</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>BADPARTY</td> <td>SMALL</td> <td>VIC</td> <td></td> <td>Yes</td> <td></td> <td></td> <td></td> </tr> <tr> <td>RETRO</td> <td>ALL</td> <td>ALL</td> <td>-</td> <td>Yes</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>Yes</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>** N = New Role, C = Current Role.</p>	Objection Code	NMI Class	Jur'n	FRMP		LR		MDP		MPB		RoLR		RP		LNSP		N	C	N	C	N	C	N	C	N	C	N	C	N	C	CONTRACT	LARGE	ALL	-	-	-	-	-	-	-	-	-	-	-	-	Yes	-	-	DECLINED	ALL	ALL	-	-	-	-	-	-	-	-	-	-	-	Yes	-	-	-	BADPARTY	SMALL	VIC												Yes				Objection Code	NMI Class	Jur'n	FRMP		LR		MDP		MPB		RoLR		RP		LNSP		N	C	N	C	N	C	N	C	N	C	N	C	N	C	DECLINED	ALL	ALL	-	-	-	-	-	-	-	-	-	-	-	Yes	-	-	-	BADPARTY	SMALL	VIC												Yes				RETRO	ALL	ALL	-	Yes	-	-	-	-	-	-	-	-	-	Yes	-	-	-
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	Section 2.10	<p>CATS v5.0 had the following changes AEMO obligations (Section 2.9)</p> <p>f) Maintain the TNI records in MSATS.</p> <p>g) Populate MSATS with the NSP2 for the appropriate WIGS NMIs.</p> <p><del>g</del>(h) <u>Populate MSATS with TNI2 for the appropriate WIGS NMIs.</u></p> <p><del>h</del>(i) Provide, on request from the New ENM, a set/range of NMIs to that New ENM for allocation by that ENM to <i>child connection points</i>.</p> <p>CATSV v5.1 has the following AEMO Obligations:</p> <p>(e) Populate MSATS with the Embedded Network Code that had been provided to AEMO by the LNSP within two <i>business days</i> of receipt.</p> <p>(f) Maintain the Transmission Node Identity (TNI Code and TNI Code 2) records in MSATS.</p> <p>(g) Populate MSATS with the NSP2 for the appropriate Wholesale, Interconnector, Generator and Sample (WIGS) NMIs.</p> <p>The obligation for AEMO to populate the TNI2 appears to have been missed. The NMI standing Data document indicates that AEMO is the party to provide the value of this field.</p>																																																																																																																																																																										

Document	Clause	Participant Comments
		PLUS ES suggests that the specific obligation for AEMO to populate the TN12 field is also included for avoidance of doubt, as previously captured in v5.0. <b>Maintaining</b> and <b>populating</b> are 2 separate activities.
	Table 16-C	All the new MSATS fields from the MSDR consultation have been included in the Table and not track changed.  PLUS ES proposes they are track changed in the marked up version - for industry clarity.
WIGS		
Metrology Part A	V7.4 - Clause 12.2 (i) sub clause (i)	PLUS ES proposes that subclause 12.2.(i) (i) should be Clause 12.2 (j).
	V7.4. Clause 12.2. (k)	Clause 12.2 (k) was captured in v7.32 of the March Retail Market Procedure Consultation but has been missed in v7.4.

Document	Clause	Participant Comments
		<p><u>(k) When the MC is informed of a metering data collection issue, the MC must:</u></p> <ul style="list-style-type: none"> <li><u>(i) within 15 business days, take the necessary steps to ensure the missing metering data collected;</u></li> <li><u>(ii) ensure that the metering installations' communications interface is maintained to facilitate ongoing collection of metering data;</u></li> <li><u>(iii) ensure that metering data is collected at a frequency that is within the energy data storage capacity of that metering installation, such that the metering data collection process prevents the loss of actual metering data; and</u>  <ul style="list-style-type: none"> <li><u>—ensure that, irrespective of the energy storage capacity of the metering installation, the metering installation reading frequency must not exceed three months since the last actual read was undertaken. The MC must use reasonable endeavours to identify if a metering installation malfunction exists within 7 days from when an MDP informs them that remote acquisition is not available.</u></li> </ul> </li> <li><u>(iv) For metering installations that have remote acquisition, the MC must use reasonable endeavours to collect metering data at a frequency that prevents the loss of actual metering data but at a frequency of no more than 14 days since the last actual metering data was collected when remote acquisition is not available.</u></li> </ul>
Metrology Part B		
MSATS Procedures: MDM Procedures		
NEM RoLR Processes Part A and Part B		
Retail Electricity Market Procedures – Glossary and Framework (Glossary and Framework)		

Document	Clause	Participant Comments
Standing Data document	V5.11 – Clause 4.1 Table 3	<p>The <u>CurrentTransformerTestDate</u> field was captured in v4.6 and has been missed from v5.11</p> 

### 5. MDFF NEM12 & NEM13

Section	Description	Participant Comments

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

Section	Description	Participant Comments

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

Section	Description	Participant Comments

**8. Standing Data document**

Section	Description	Participant Comments

**9. MSATS Procedures: MSATS Procedures: CATS**

Section	Description	Participant Comments

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

Section	Description	Participant Comments

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

Section	Description	Participant Comments

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

Section	Description	Participant Comments

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

Section	Description	Participant Comments

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

Section	Description	Participant Comments