MSATS STANDING DATA REVIEW IMPLEMENTATION DATE

PROPOSED MINOR AMENDMENT

PARTICIPANT RESPONSE TEMPLATE

Participant: AGL

Submission Date: 17 Dec 2021

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed minor amendment process associated with the MSATS Standing Data Review implementation date.

The changes being proposed to the implementation date from 1 May 2022 to 7 November 2022 necessitate changes to AEMO's Retail Electricity Market Procedures.

Questions on proposed changes

Question		Participant Comments	
Does your organisation agree with the proposed change to the implementation start date?	AGL is aware the issues surrounding the implementation of the changes for MSATS standing data and notes that this will require a two staged process – initially to deal with the schema change and secondly to deal with the implementation of the new fields and archiving of the old fields. AGL also notes that at a recent transition workshop, it was agreed that there would be a 12-month gap between the new MSDR fields commencing and the old fields being archived. This doesn't seem to be reflected in the consultation proposal, which indicates old fields being archived from the stage 2 start date. Can this please be confirmed ?		
Does your organisation Noting the obligation dates for Global settlements an have an alternate proposal for implementation?		or Global settlements and Shared Fuse information, AGL does not propose any other change.	

Please note additional comments about specific drafting below.

Other Comments

Metrology Procedure – Part A v7.4

Section	Description	Participant Comments
Version History	Note v7.2 missing from version history.	
14 (a), 14(b)	The final Rule made by the AEMC requires DNSPs to record and MCs and FRMPs to notify DNSPs of a Shred Fuse arrangement when they become aware of that arrangement. The drafting in the Metrology Procedure does not specify that, but rather specifies that the DNSPs must record those arrangements and that MCs and FRMPs must notify the DNSP of any new or existing Shared Fuse arrangements. Removing the words 'becoming aware' changes the obligation from one of advise when identified to an obligation to actively review each connections, which is substantially different to the Rule obligation.	Insert the phrase 'when they become aware' into clauses 14(a) and 14(b).
14(c)	Noting the discussions held within the B2B Working group on the provision of shared fuse information to the DNSP, it is suggested that this clause be extended to include the MPB (current or pending).	Suggested addition: MC or the FRMP <u>and may notify the DNSP</u> of any

CATS - v5.01

Section	Description	Participant Comments
2.2(r),(s)	Clauses (r) and (s) place obligations on the FRMP to notify the LNSP of any shared fuse arrangements, however, do not contemplate the FRMP arrangements and obligations of the MC to undertake the same notification. The drafting as it stands would see both the MC and the FRMP notify the LNSP of the same shared fuse arrangement.	Propose that for these clauses, that the FRMP obligation be amended to 'notify, or ensure that the LNSP is notified, ' To allow for arrangements between the FRMP and MC to meet this obligation.
2.5 (k), (l)	Noting that the Metering Provider is an agent of the MC, the obligations to notify the MC can be extended to the MPB (current or pending) to notify the LNSP on behalf of the MC to meet the MC obligations.	
2.6 (k),(l)	Clauses (r) and (s) place obligations on the FRMP to notify the LNSP of any shared fuse arrangements, however, do not contemplate the MC arrangements with MPBs who may undertake the same notification.	Propose that for these clauses, that the MC obligation be amended to 'notify, or ensure that the LNSP is notified,' to allow for arrangements between the MC and MPB (current or pending) to meet this obligation.