

MSATS STANDING DATA REVIEW IMPLEMENTATION DATE

MINOR AMENDMENT FINAL REPORT

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EXECUTIVE SUMMARY

The publication of this Paper completes the process (Process) conducted by AEMO to consider the minor amendment (Proposal) to the effective date from 1 May 2022 to 7 November 2022 of the MSATS Standing Data Review (MSDR)-related changes (Changes) in respect of the following procedures (Procedures):

- MSATS Procedures: CATS Procedures
- MSATS Procedures: WIGS Procedures
- Standing Data for MSATS document
- Metrology Procedure: Part A
- Retail Electricity Market Procedures – Glossary and Framework

AEMO completed the full consultations on the Changes in 2020 in accordance with rule 8.9 of the National Electricity Rules (NER) (Full 2020 Consultations).

AEMO received eight submissions in response to the Minor Amendment Proposal Paper (Proposal Paper). These submissions generally supported the Proposal and provided suggested future activities.

AEMO's final determination is to amend the Procedures in the form published with this Final Report. The effective date of these amendments is 7 November 2022.



CONTENTS

EXECUTIVE SUMMARY	2
1. PROCESS	4
2. BACKGROUND	4
2.1. NER requirements	4
2.2. Context for this minor amendment	4
2.3. Minor Amendment Proposal Process	5
3. AEMO CONSIDERATION	5
4. OTHER MATTERS	5
APPENDIX A. SUMMARY OF SUBMISSIONS AND AEMO RESPONSES	6
5. FINAL DETERMINATION	14



1. PROCESS

AEMO has undertaken the Process in accordance with NER 7.16.7(e).

The table below outlines the steps in the Process.

Deliverable	Indicative date
Minor Amendment Proposal Paper published	3/12/2021
Submissions due on the Minor Amendment Proposal Paper	17/12/2021
Final Report published	21/1/2022

The publication of this Final Report marks the completion of the Process. The Final Report presents AEMO responses to the feedback received.

2. BACKGROUND

On 26 November 2021, AEMO advised the May 2022 Readiness Working Group (RWG) of its Proposal to change the effective date to 7 November 2022. AEMO presented and discussed the Proposal at the Electricity Retail Consultative Forum (ERCF) – including in the context of the plans to seek feedback from industry on the Procedures.

2.1. NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in Chapter 7 except for procedures established and maintained under NER 7.17.

The procedures authorised by AEMO under Chapter 7 must be established and maintained by AEMO in accordance with the NER, including NER 7.16.1 and 7.16.7(e).

2.2. Context for this minor amendment

AEMO considers that delivering the MSDR Changes by 1 May 2022 is high risk, due to the complexity of the solution architecture, as well as constraints, including unexpected resource constraints, in particular in respect of developers with experience of the MSATS systems.

Further, in light of the prioritisation of delivering rule changes, there is a significant risk associated with the bundling of Global Settlement (GS), MSDR and Metering Coordinator Planned Interruptions (MCPI).

Accordingly, the Proposal is that AEMO will deliver the Changes on 7 November 2022, as follows

MSDR Phase 1 (1 May 2022)	MSDR Phase 2 (7 November 2022)
Metering Coordinator Planned Interruption (MCPI): Shared Isolation Point Flag	Changes to MSATs to reflect New and Amended MSDR Fields
aseXML schema changes	Retired/deprecated fields
Blind Update Tool for the Shared Isolation Point Flag	Scripts for data changes
	Blind Update Tool: Selected new fields per the Data Transition Plan

Under the Proposal, the implementation would be delayed to MSDR Phase 2 (7 November 2022) of the following Change Information Papers (CIP):

- CIP_013 Change Cancellation Timeframe for CR6800 in MSATS
- CIP_016 Reinstate MC Objection for Vic Small
- CIP_031 Small and Large NMI Classifications



Consequently, the release of new and amended MSDR fields into MSATS Standing Data would be deferred until 7 November 2022.

2.3. Minor Amendment Proposal Process

AEMO issued the Minor Amendment Proposal Paper for feedback on 3 December 2021.

AEMO received eight written submissions in response.

Copies of all written submissions, minutes of meetings and issues raised in forums (excluding any confidential information) have been published at: <https://aemo.com.au/consultations/current-and-closed-consultations/msats-standing-data-review-implementation-date>

A detailed summary of issues raised by Participants in submissions, together with AEMO's responses, is contained in **Appendix B**.

3. AEMO CONSIDERATION

Red Energy and Lumo Energy commented that they "...do not see this as a minor change and query why AEMO considers this a minor amendment to the Procedures".

AEMO considers that the Proposal to change the effective date is a minor change. The Proposal does not result in any changes to the meaning of clauses in the Procedures. AEMO notes that Red Energy and Lumo Energy supported the Proposal to change the effective date in their submission.

4. OTHER MATTERS

AGL and Red Energy and Lumo Energy commented that there should be a gap of 12 months between the introduction of new and changed fields and the second stage which is the removal of some fields. AEMO notes that there is a transition process currently underway through the RWG and subgroups - for example, to improve the quality of data in structured address fields, prior to the unstructured address fields being removed. There is also a 12 month "compliance holiday" for provision of data, to provide an orderly update of AEMO and participant data bases.

AGL and Alinta Energy commented that there was no version 7.2 in the version history table for the Metrology Procedures Part A. As background/context, the Metering ICF 2020 Package Consultation initially created a version 7.2 of the Metrology Procedure Part A and also Part B. However, there were no changes to Metrology Procedure Part A contained within the Final Report of that consultation, as the proposed change was not made in the Final Determination. With sometimes long lead times between consultations and procedures becoming effective, subsequent versions of procedures had assumed version 7.2 changes would be made and were numbered from version 7.3 on. Therefore, version 7.2 has not been used. Further, AEMO has updated the version history table to note that the version number 7.2 was not used, to avoid confusion.



APPENDIX A. SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

No.	Question	Consulted person	Participant comment	AEMO response
1.	Does your organisation agree with the proposed change to the implementation dates?	AGL	<p>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.</p> <p>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?</p>	<p>AEMO notes that the proposed change in this minor amendment process is to the commencement date of stage one changes (new and changed fields).</p> <p>AEMO considers that changing the date for the second stage (removed fields) is not needed to de-risk the delivery of the overall MSDR changes.</p> <p>Regardless, there is still a data transition approach including compliance holidays and the delayed implementation of GPS coordinates to allow for collection and provision of data to MSATS.</p>
2.		Alinta Energy	Yes	AEMO notes respondent's support for the proposed change.
3.		Citipower, Powercor and United Energy	<p>We are not supportive of any delay to the effective start date of the MSDR. A delay will result in unnecessary costs for all industry participants, and ultimately impact the affordability and quality of the services received by our customers. It is not prudent, or in the interests of our customers, for AEMO to delay anticipated changes to market procedures, particularly as we face significant anticipated changes to the wholesale market, as part of the post-2025 National Electricity Market (NEM) design, that will require frequent system upgrades.</p> <p>We are already making substantial investments to prepare our systems for the MSDR changes to take effect on 1 May 2022, which include management of multiple IT systems. IT system upgrades take significant planning and forward investment to ensure a smooth go-live delivery. Delaying these system changes requires daily maintenance of the legacy systems and repeated testing of the new systems until a new implementation date is established. We must also continue to pay additional costs to vendors that would not otherwise be necessary.</p>	<p>AEMO notes respondent's comment but considers that should implementation of the stage one changes to MSDR would put all of industry (and therefore customers) at risk of non-delivery. AEMO considers that complexity of solution architecture, along with resource and environment constraints warrants the delay. The delay is prudent risk management strategy. We do however acknowledge that this delay is not without cost to some industry participants.</p> <p>It should be noted that the planned aseXML Schema change will occur on the original proposed date. AEMO also notes that when the minor amendment process was flagged to participants at the RWG, AEMO did not receive feedback against the proposed delay.</p>



No.	Question	Consulted person	Participant comment	AEMO response
			Based on the proposed delay, we anticipate the cost to our customers would be approximately \$1 million. These are unnecessary and wasteful costs that are purely related to the delay. AEMO must take these costs into account in its decision to delay any implementation of system upgrades for the MSDR.	
4.		Jemena	We would prefer there to be no delay to the timing of the implementation.	AEMO notes respondent's comment and refers to the response in item 3 above
5.		Origin Energy	<p>In principle, Origin Energy's broadly supports the delayed implementation, as it will provide an opportunity to include other proposed changes to be implemented altogether, including Origin's ICF on GPS coordinates for non-contestable loads. Having said that, due to the close proximity of 7th November 2022 with Consumer Data Right's (CDR) go-live on 15th November 2022, Origin Energy is concerned whether 7th November 2022 is a practical date to implement bulk of MSDR changes. As such, it is important to understand whether AEMO has performed adequate dependency management exercise to ensure the risks associated with industry operations are well understood and managed beforehand. One of the key risk is the industry testing for MSDR would not be fit-for-purpose for CDR, and vice versa.</p> <p>With that in mind, Origin Energy suggests AEMO to facilitate a two-fold approach, i.e. governance for 7th November 2022 go-live (as normal) and targeted CDR support to industry participants subjected to 15th November 2022 go-live. Proposed activities may include, but not limited to:</p> <ul style="list-style-type: none"> - AEMO to publish an updated version of 'Regulatory Implementation Roadmap' on its website to include the proposed MSDR go-live and CDR go-live dates/milestones; - AEMO to continue providing industry-wide governance for MSDR go-live and confirm whether CDR go-live poses any additional challenges (not limited to AEMO, but across the market); 	<p>AEMO notes respondent's support for the proposed change.</p> <p>AEMO agrees that it is important that related projects should be treated holistically by AEMO and industry and that the governance and communications be coordinated. In particular, AEMO is looking at expanding the RWG Industry governance with CDR on the AEMO agenda.</p> <p>The suggestion to expand the Regulatory Implementation Road map we will consider although this may be better placed in industry governance through the RWG.</p> <p>Origin should also note that:</p> <ul style="list-style-type: none"> • The CDR retail procedure consultation is planned for early February (CATS, Glossary and Framework, and Standing Data for MSATS). • The CDR testing environment will not be ready for March 2022. An update will be provided to industry once that date has been determined, AEMO recognises the urgency in providing that testing environment to industry.



No.	Question	Consulted person	Participant comment	AEMO response
			<ul style="list-style-type: none"> - AEMO to provide detailed dependency management on impacted market procedures and market systems; - AEMO to provide an environment and test strategy no later than 1 Mar 2022 to provide industry confidence of AEMO's ability to facilitate CDR-based market testing and MSDR testing concurrently. This will ensure there is no compromise of either reform due to conflicting testing requirements; and - at a minimum, AEMO to facilitate CDR go-live risk/issues register as a standalone activity, to be governed amongst targeted participants 	
6.		PLUS ES	<p>Whilst a further delay is not ideal and the approach not the most efficient, PLUS ES accepts the proposed change to the implementation start date with the following caveats:</p> <ul style="list-style-type: none"> • Data which is currently available in MSATS for fields to be 'removed' is maintained post 7 Nov 2022 – since the availability in MSATS of the new fields and the removal of obsolete fields will go-live on the same date • Ensuring a consistent flow of data availability/updating 	AEMO notes respondent's comment and refers to the response in item 1
7.		Red Energy and Lumo Energy	<p>Red Energy and Lumo Energy (Red and Lumo) do not see this as a minor change and query why AEMO considers this a minor amendment to the Procedures. As combining Phase 1 which includes the introduction of new fields and amendment of existing fields, with Phase 2 which includes the deletion of existing fields from MSATS, takes away the transition period. This transition period is vital to allow for the clean up of structured addresses before removing unstructured addresses. The alleviation of this transition period alone is sufficient to warrant a full, rather than minor, consultation. Despite AEMO not being impacted by the change of addressing, for example, we are keen to understand how AEMO intends to coordinate participants responsible for these activities and ensure that there is no end customer impact (nor retailer impact) on with the change in date.</p>	<p>AEMO notes respondent's comment and refers to the response in item 1.</p> <p>AEMO considers that the Minor Amendment Process is the appropriate method of consulting with industry in this instance. The proposed change does not change content of meaning of procedures, merely changes the commencement date of MSDR new and changed fields to give AEMO and participants more time to change systems and processes.</p> <p>The MSDR Transition has a targeted approach to clean up structured address prior to 7 Nov 2022. This is already underway via the ERCF and is</p>



No.	Question	Consulted person	Participant comment	AEMO response
			<p>At a previous MSDR transition meeting, it was agreed that there would be a 12-month gap between the new MSDR fields commencing and the old fields being archived. This is not reflected in the revised consultation proposal, which as it stands indicates the old fields being archived from the stage 2 start date, again not allowing for any transition period.</p> <p>Red and Lumo do not object to the change to the implementation start date for MSDR Phase 1 to be moved from 1 May 2022 to 7 November 2022. However, we firmly request AEMO provide clarity around the two points mentioned above to avoid consumer impact.</p>	<p>being conducted independently to the change to the effective date. As such AEMO does not consider that there is a material impact of the delay in phase one.</p>
8.		TasNetworks	<p>TasNetworks acknowledges AEMO's proposal to delay the implementation of MSDR changes to 7 Nov 2022 and notes AEMO's position communicated through respective forums of their inability to meet the 1 May 2022 date.</p> <p>TasNetworks makes the following observations as a consequence of this change:</p> <ul style="list-style-type: none"> • Participants do not have the same ability that AEMO do in making a decision to defer the implementation. If a participant wasn't able to meet the timeframe they would have to consider contingency/workaround arrangements. • TasNetworks, like many other participants, has already invested and committed time, costs and resources in planning for a 1 May 2022 implementation and will now have to incur additional investment of this type to now replan for the delay. • There is potential for an increased risk by having to now undertake both MSDR and B2B changes at the same time in Nov 2022 • Any commercial arrangements with software vendors will also have to be rescoped and negotiated. 	<p>AEMO notes respondent's comment. AEMO does undertake these analyses with respect to the delivery of projects but notes that MSDR resources continue to be occupied by the ongoing overhang of previously implemented projects in late 2021 as well as unexpected staff resignations.</p> <p>Participants via the B2BWG requested of AEMO that B2B changes occur around the same time as MSDR to minimise number of times participant IT systems were changed. This has been reflected in the timing of the two sets of changes.</p>



No.	Question	Consulted person	Participant comment	AEMO response
			<ul style="list-style-type: none"> The overall project timeframe for participants is now extended. This may impact participant's ability to undertake other crucial business related initiatives as additional cost and resource commitments are now required to meet the demands of the delay. <p>TasNetworks requests that AEMO undertake a more detailed assessment during future consultation initiatives, prior to final determinations or rule decisions, to determine their ability to implement changes on the proposed date. It is critical that participants have surety of the proposed date prior to the final stage, as delays such as this cause substantial impost on all parties involved.</p>	
9.	Does your organisation have an alternate proposal for implementation?	AGL	Noting the obligation dates for Global settlements and Shared Fuse information, AGL does not propose any other change.	AEMO notes the respondent's comment.
10.		Alinta Energy	No	AEMO notes the respondent's comment.
11.		Red Energy and Lumo Energy	Red and Lumo do not propose any alternate date.	AEMO notes the respondent's comment.
12.		TasNetworks	TasNetworks does not have an alternate proposal.	AEMO notes the respondent's comment.
13.	Other comments	AGL	Metrology Procedure – Part A v7.4. Note v7.2 missing from version history.	AEMO notes respondent's comment. The version history table has been updated accordingly.
14.		AGL	<p>Metrology Procedure – Part A v7.4. section 14 (a), 14(b)</p> <p>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.</p> <p>The drafting in the Metrology Procedure does not specify that, but rather specifies that the DNSPs must record those</p>	AEMO notes the respondent's comment. As part of the Minor Amendment Process, AEMO is not making changes as part of this consultation beyond the original scope of the proposed change of implementation date. The changes proposed in the comment should be provided via the ERCF process.



No.	Question	Consulted person	Participant comment	AEMO response
			<p>arrangements and that MCs and FRMPs must notify the DNSP of any new or existing Shared Fuse arrangements.</p> <p>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.</p> <p>Insert the phrase 'when they become aware' into clauses 14(a) and 14(b).</p>	
15.		AGL	<p>Metrology Procedure – Part A v7.4. section 14(c)</p> <p>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).</p> <p>Suggested addition: <u>.....MC or the FRMP and may notify the DNSP of any...</u></p>	AEMO notes respondent's comment and refers to the response in item 14.
16.		AGL	<p>CATS – v5.01. section 2.2(r),(s)</p> <p>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.</p> <p>The drafting as it stands would see both the MC and the FRMP notify the LNSP of the same shared fuse arrangement.</p> <p>Propose that for these clauses, that the FRMP obligation be amended to</p> <p>'notify, or ensure that the LNSP is notified, ..'</p> <p>To allow for arrangements between the FRMP and MC to meet this obligation.</p>	AEMO notes respondent's comment and refers to the response in item 14.
17.		AGL	<p>CATS – v5.01. section 2.5 (k), (l)</p> <p>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.</p>	AEMO notes respondent's comment and refers to the response in item 14.
18.		AGL	<p>CATS – v5.01. section 2.6 (k),(l)</p>	AEMO notes respondent's comment and refers to the response in item 14.



No.	Question	Consulted person	Participant comment	AEMO response
			<p>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.</p> <p>Propose that for these clauses, that the MC obligation be amended to</p> <p>'notify, or ensure that the LNSP is notified, ..'</p> <p>to allow for arrangements between the MC and MPB (current or pending) to meet this obligation.</p>	
19.		Alinta Energy	Metrology Procedure – Part A v7.4. Note v7.2 missing from version history.	AEMO notes respondent's comment. The version history table has been updated accordingly.
20.		Alinta Energy	<p>Metrology Procedure – Part A v7.4</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Insert the phrase 'when they become aware' into clauses 14(a) and 14(b).</p>	AEMO notes respondent's comment and refers to the response in item 14.
21.		Citipower, Powercor and United Energy	The proposed delayed implementation date, 7 November 2022, falls on a Monday. To minimise impact to business-as-usual operations during the week, we propose any final implementation date is either a Saturday or a Sunday. Our experience shows go-live dates that take place during the week are significantly more disruptive to daily operations than if the	AEMO notes the respondent's comments about the effective date of the procedures commencing on a Monday. The IT implementation will occur on the Sunday to meet the procedural effective date of 12:01 am Monday 7 November 2022.



No.	Question	Consulted person	Participant comment	AEMO response
			implementation took place during the weekend when activity is lower.	
22.		Citipower, Powercor and United Energy	If the implementation of the MSDR is to be delayed, we recommend ICF_016 Reinstate the MC Objection of BadParty for Victorian SMALL NMLs still become effective on 1 May 2022. The reinstatement of the objection code should be a minor change for AEMO, but it would allow us and other Victorian distributors to implement this change that will minimise disruption to our customers from inappropriate metering installations. Until the objection code is reinstated, we will need to continue to replace objectionable meters on our network, increasing cost and customer disruption.	AEMO notes the respondent's comments however this would require a change to AEMO's IT systems, hence the delayed implementation. Changes made as part of the May release have no IT changes (with the exception of MCPI which is a Rule requirement).
23.		Jemena	We would like ICF_016 Reinstate the MC Objection of "BadParty" for Victorian SMALL NMLs to be retained with an effective date of 1 May 2022. With an effective date of 7 November our preference is that the industry cutover occurs on Sunday 6 November. This will minimise the impact to business as usual operations for participants and the market as a whole. This will allow Sunday shakeout to occur in readiness for Monday commencement.	AEMO notes respondent's comment and refers to the response in item 22.
24.		PLUS ES	Metrology Part A v73 section 14 (b) Recent participant suggestions/comments with respect to the process of provisioning Shared fuse arrangement information, potentially remove the flexibility for process efficiencies and could lead to an increase in administrative effort and participant against. The procedures call for the FRMPs and MCs to notify the LNSP as this mirror and satisfies the NER rules. The obligations should not be interpreted as prescriptive processes to be followed. There appear to be participant interpretations that the FRMP/MC will notify the LNSP, to the exclusion of the MPB who is the actual party identifying the shared fuse arrangements on site. If this is interpreted literally it would cause duplication of the same detail and unnecessary administrative handling In the current world of contractual agreements the FRMP and the MC could possibly negotiate processes whereby their associated Service providers meet the obligations. For downstream	AEMO notes respondent's comment and refers to the response in item 14.



No.	Question	Consulted person	Participant comment	AEMO response
			<p>efficiency, given the MPB (current or incoming) is the party who visits the site, some MC agreements could require the MPB to notify directly the LNSP instead of going through intermediaries such as the MC.</p> <p>PLUS ES proposes that the clauses be reviewed and amended accordingly to allow for flexible industry efficient processes</p>	
25.		PLUS ES	<p>In addition to the above clause 14(c) calls for the MPB to notify the MC.</p> <p>There are participants who interpret the role to be current and confirmed in MSATS.</p> <p>For the bulk of shared fuse arrangements the party which will be identifying shared fuse arrangements will be the incoming MPB – given that in majority of cases, the site visit will consist of a meter churn from Type5/6 to contestable metering. The MPB will not be confirmed in MSATS until their meter has been installed on the site – an activity which the shared fuse arrangement will prevent.</p> <p>To deliver flexible and efficient industry processes, PLUS ES is proposing that the obligation/s which relate to the MPB and shared fuse arrangements are amended to clarify that the MPB participant can be current or incoming.</p>	AEMO notes respondent's comment and refers to the response in item 14.

The minor amendment has been finalised in the Procedures. The effective date of the MSDR amendments which relate to new and changed fields is 7 November 2022. Clean and change-marked versions of the Procedures are available at: <https://aemo.com.au/consultations/current-and-closed-consultations/msdr-and-mcpieffective-date-change-process>.

5. FINAL DETERMINATION

AEMO's final determination is to amend the Procedures in the form published with this Final Report, in accordance with NER Chapter 7.