

Table 6 – MSATS Procedures: CATS Procedure Principles and Obligations

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	AGL	General		It is clear from discussion and feedback that there is a lack of clarity ion some of the key CATS transactions. AGL suggests that scenarios showing roles and transactions be mapped to show the transactions required.	Any market readiness activities resulting from the procedure changes will be referred to the project market readiness workstream, noting that market readiness activities undertaken by AEMO will not include the coordination of matters that are subject to commercial agreement between participants and providers resulting from the changes to the NER and procedures.
2.	Momentum			Use cases and process flows: Momentum recommends including a “build pack” view for Electricity Procedures, and use case scenarios for MSATS and CATS transactions due to the complexity with various participants.	
3.	Energy Australia			CATS Procedures – Include Workflows Suggest to include workflows / process flows for transactions to illustrate the requirements and timings for common scenarios (i.e. similar to Gas industry documentation).	
4.	United Energy			G9 – Sequence of CATS transactions for a meter churn The Rules Clause 7.6.2 and 7.8.9 and the Metrology Part A Procedures 11.1 and 11.3 imply a strict sequence of role changes and alignment of some role changes with the Meter Exchange date. UE believes that the sequence of CATS CRs needed to affect a Meter Churn in accordance with these rules is constrained by the rules, and that quite a number of CATS role change transactions, in particular some retrospective transactions cannot be used because they don’t strictly conform to the rules. UE believe it would be of immense value to all participants if AEMO were to produce worked examples (including the timing and delays caused by objection periods etc.) showing the allowable sequence of CATS CRs under Meter Churn scenarios, and that this will inform the Conditions Precedent, and the description needed for the relevant CRs. Some scenarios that could usefully be explored are: <ul style="list-style-type: none">- Meter Churn where the New MC is also appointing a new MDP and MP- Emergency Meter Churn where an Initial MC informs a Retailer of a failed meter which causes the customer to be off supply.- UE also recommend that the workflow of a logical meter exchange be agreed, i.e. where a type 4 meter may need to be reassigned to a type 4A if the next small customer refuses to have a remotely communicating meter, similarly for vice versa when a type 4A is able to have cost effective communications available or when the refusing customer moves premises. UE consider that a CR3090/3091 could be used, whilst other participants may consider a CR3080 should be used. UE re-iterate that it is important that the processes work end to end and establish manual read cycles etc. when required in a standard process.	
5.	Red / Lumo	MSATS Procedures (Application)		Please note that the appropriate Change Request for a LARGE NMI is CR 1020 – Change Retailer – Retrospective – Long Term / Error (not SMALL3). More information about this Change Request is provided in Section 0. Due to time constraints, this has not been highlighted for each section where this occurs throughout the draft Procedure document within Red and Lumo’s response. The final version of this and other Procedures which make reference to a particular section are to be cross referenced to ensure the correct Procedure, section and reference to the NER, inclusive of clause, is provided.	Agreed
6.	AusNet Services	Objection Logging Period		General Comment (1) AusNet Services still believes that 1 business day is not sufficient for objections. It does not provide enough time for parties to investigate as to whether they have reason to object. Has AEMO investigated how may of those 92% were lifted due to them being incorrectly objected too? Reducing the amount of days allowable for objections could increase behaviour of objecting in all cases to enable participants time to perform an investigation. This would be a perverse outcome since the objection clearing period is 20 business days. We believe the objections days should not be changed as this is not a requirement of PoC and could be looked at again as part of the Customer Switching rule changes.	Refer to section 4.4 in the POC Procedures Final Report and Determination
7.	Momentum			Objection logging period:	

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				<p>Momentum Energy would not be supportive of any change to the objection logging period, provided there are no implications from any of the Rule changes to reduce the objection logging period.</p> <p>This can be reviewed post 1st Dec 2017, however it we don't see this as a priority for "Day 1" and infact it can pose a major risk on the processes due to potential market instability at Day 1.</p>	
8.	Ergon			<p>AEMO has proposed a blanket reduction of the objection logging period from 5 days to 1 day. Ergon Energy does not support that proposal for the following reasons:</p> <ul style="list-style-type: none"> • Ergon Energy is not aware that there has been a cost benefit analysis of the proposed change; • The proposal it is outside of scope of the Power of Choice procedure changes and we would not classify this as an error correction or non-contentious change; • The change has the potential to lead to the widespread use of auto objections by participants; • The assessment criteria for considering the proposal was too narrow i.e. the number of objections on day 2-5 may be small relative to the overall number of objections (8%). However, the implication of unwinding the Change Request because an objection was not lodged in time may be substantive; • The 8% of transactions that would otherwise have been objected to in the 2-5 days window will result in rework for participants on both sides of the transaction; • This rework would likely require extra resources; • We understand that for some smaller participants that transactions are reviewed manually for potential objections; • We assume that the 8% of all objections would be a sizeable volume of transactions; and • The effective date of the transaction would not be changed as a result of the reduced objection logging period. 	
9.	AGL			<p>Change to Objection Logging Period</p> <p>AEMO has stated that it could not find a compelling argument to maintain the existing Objection Logging Period and can only point to a study which showed that 92 % of Objections were logged within 1 business day.</p> <p>AGL rejects this draft decision for the following reasons:</p> <ol style="list-style-type: none"> 1. AGL does not see an obligation arising from the Rule changes for amend the Objection Logging Period and questions the basis for AEMO's considering this change in amending these procedures, as AEMO has stated that the basis for all changes are those directly related to the Metering Competition Rule Change; 2. AEMO has not undertaken a review of CRs that are reviewed by industry, but which do not lead to an objection being raised, to determine the number and time required for these CRs to be reviewed; 3. Industry parties who have reviewed this change have indicated that there are substantial costs associated with the reduction to 1 business day; 4. AEMO has neither undertaken, nor presented, a cost –benefit for making this change. <p>At this time, AGL does not believe that AEMO has met its obligations to ensure that this change meets the National Electricity Objective and therefore AGL finds compelling reason to object to AEMO's draft decision.</p>	
10.	United Energy			<p>G5 - Objection Logging periods 4.7.4</p> <p>Despite a number of participants in workshops and in their responses supporting no change to objection logging periods, AEMO state that there is no compelling argument to hold to the current positions of 5 business days.</p> <p>UE are of the view that there is instead inadequate justification to support a change from the current 5 days to the 1 day proposed by AEMO. We note that a number of valid reasons for not changing from the 5 days period have been discussed in the recent workshops:</p> <ul style="list-style-type: none"> • Small retailers may not have the system capability to automate a response and a 1 business turnaround time is not sufficient and could lead to more objections than needed, the same could apply to any number of the new metering participants, MC,MP and MDP who may not have the system capability and the resources for a 1 day review • 1 business day allows no follow up for a retailer with metering parties or with a customer where they need to establish if an objections is warranted or not • Encouraging a behaviour pattern where recipients will object as a matter of course to give themselves time, and then withdraw that objection after review. This will result in an overall a higher level of objections and a general increase in back office work for the parties involved 	

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				<p>and the businesses that deal with re-work, errors and customer complaints.</p> <ul style="list-style-type: none"> The change is not a direct outcome of the metering competition rule and should be out of scope. Before introducing such a change a study of the costs and benefits should be first undertaken by AEMO. With very significant level of role and responsibility changes and the lateness of the finalisation of these changes, the early part of the metering competition market is not the time to make such a change, it is better to allow the time to get the transactions right the first time across all of the systems. <p>UE suggest that this change not be undertaken at this time, but be reviewed again after several years of metering competition once all systems and processes are working properly across industry.</p>	
11.	Energy Australia			<p>Change to Objection Logging Period</p> <p>In relation to the multiple references in the CATS procedure regarding Objection logging period and in AEMO's Draft Report, EA asserts that we do not support reducing the obligations logging period to 1 business day.</p> <p>AEMO has stated that it could not find a compelling argument to maintain the existing Objection Logging Period and can only point to a study which showed that 92 % of Objections were logged within 1 business day. We suspect objections logged in 1 business day is due to participants having an automatic rule in their systems to raise objections. If this is the case, the data used to form this decision to reduce the objection logging period is problematic and shouldn't be used as a basis for the decision.</p> <p>Furthermore, we believe the draft decision should be rejected as:</p> <ol style="list-style-type: none"> There is no obligation arising from the Rule changes for amend the Objection Logging Period and questions the basis for AEMO's considering this change in amending these procedures, as AEMO has stated that the basis for all changes are those directly related to the Metering Competition Rule Change; AEMO has not undertaken a review of CRs that are reviewed by industry, but which do not lead to an objection being raised, to determine the number and time required for these CRs to be reviewed; Industry parties who have reviewed this change have indicated that there are substantial costs associated with the reduction to 1 business day; <p>There has been no cost –benefit for making this change.</p>	
12.	Active Stream			<p>Active Stream consider that a reduction from 5 days down to 1 is inadequate and suggests 2-3 day to avoid exceptions</p>	
13.	Red Lumo			<p>Red and Lumo strongly object to the objection timeframes being amended. AEMO has been very clear and consistent that the scope of this consultation is only in relation to the three rule changes. Therefore, it is inappropriate for AEMO to propose a change to the objection windows, further the reduction the number of days from 5 to 1 for a participant to log an objection during this consultation. Red and Lumo would like AEMO to highlight where this change is described in the final rule changes for Metering Competition, Embedded Networks and the Meter Replacement Processes.</p> <p>We consider that the outcome of the two current rule changes, Improving the Accuracy of Customer Transfers and Using Estimated Reads for Customer Transfers, may impact the objection timeframes. However, these rules are still in consultation, as such it is premature for AEMO to amend the current objection windows without allowing the AEMC to complete its review.</p> <p>This change can have a significant impact on our business and our business processes. As noted above, the current proposal of one business day for a participant to investigate and determine if an objection is to be submitted with the relevant objection code is an insufficient timeframe. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodging period has passed by the next business day. We consider that this change may force participants to automate an objection and then review to remove the objection, which is not in the spirit of the Procedures. Further, we recommend that AEMO discuss their proposed approach with industry participants particularly in light of changes resulting from the hardship review in Victoria that are currently progressing.</p> <p>Red and Lumo strongly urge AEMO to retain the existing 5 business days for an objection period. Should you wish to discuss our issue with the objection window change, we would welcome that discussion</p>	
14.	CitiPower & PowerCor, SAPN	4.8	Objection Rules	<p>CP/PAL & SAPN does not support the reduction of Ojection Logging Period from 5 business days to 1 business day – made to several clauses/tables throughout this procedure.</p> <p>The impact of this change has not been fully considered by Industry and therefore should remain as 5 days. This change is not driven by NER changes for Metering Contestability and not critical for 1 December. It should be considered by Industry at a later stage when a full assessment of the impact to Participant process and systems has been completed and a full Cost Benefit completed.</p>	

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15.	Pacific Hydro	7.7	Timeframe Rules	It is strongly suggested the objection logging period remain at 5 days. Reducing it to one day, with an influx of new market MC entrants whose systems may not be to the level of sophistication as some participants and who may be relying on manual processes, will only lead to error and rework across the market.	
16.	United Energy	7.7, 8.6	Timeframe Rules	[8.6] UE agrees with other participants that reducing this to 1 business day is not the best approach and should be left at 5 days or 3 days as a minimum. AEMO is making its assessment on the basis that in current settled market conditions >95% of transfers are completed within 1 business day. Given the increase in the number of players and complexity in the market following 1 December, the rate of erroneous transfers is likely to increase. This change should be as a minimum be deferred until the new market has settled, then make the change as this is more a process improvement for retailer transfers, not metering competition...	
17.	Aurora	8.8, 9.7, 10.8, 12.7, 32.6, 33.7, 34.6, 35.6, 36.6, 37.6, 38.6, 39.8	Objection Rules	Objection period to be kept at 5 days, small retailers such as Aurora Energy do not have the resources or have an automated system to object. Objections are likely to increase substantially as participants will have not enough time to review the CRs and, as a result, they will just object to be able to have time to review it.	
18.	Red Lumo	7.7, 8.6, 9.7, 11.6, 12.6, 13.5, 14.5, 25.8, 31.5, 32.6, 33.5, 34.5, 35.5, 37.5, 38.7	Objection Rules	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day. The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.	
19.	Vector	38.7	Objection Rules	Vector AMS support AEMO's position to reduce the objection period from 5 days to 1 day. Vector AMS support a one day objection period to improve customer switching times consistent with the associated AEMC objectives. Vector AMS acknowledge that there are other market participants who have objected to the one day objection period. As such if AEMO are to consider increasing the proposed objection period, Vector AMS would suggest moving forward with the shortest possible (agreeable) objection period, given that the current 5 day objection period does not provide a good outcome for consumers.	
20.	AusNet Services	General	Network Tariff Codes	General Comment (2) Regarding the mandatory requirement for MPB to update the network tariff code (NTC) AusNet Services recommends not making the NTC mandatory. How are MP's expected to know if the network tariff is correct or not? When meters are created for the first time only the DB would know what is the correct network tariff applicable for the NMI. When a meter is first created for a NMI, how are they to check the NTC is correct when they have nothing to check it against. Is it expected that the MP when creating this meter for a meter replace will use existing NTCs from other meters that may or may not be onsite? A process needs to be put in place to obtain the NTC from the DB to align with the metering configuration the Retailer has requested. The introduction of this as mandatory will result in numerous network billing enquiries and disputes between the retailer and the network business. The retailer will incorrectly assume the value populated by the MP in MSATS represents the billable amount only to be corrected by the value the network business has applied. The retailer would have to make the adjustment in their systems. This may or may not involve updating MSATS. An incorrect NTC is just a detrimental to the operation of retail contestability as a blank NTC. To correct the data in MSATS both the retailers and DBs would have establish processes whereby they would have to validate the NTC that the MPB has input and then correct it if it's incorrect. Today with it being left blank allows the DB's to update an ensure the correct NTC is applied when the MP does not know. A process for the below clause from the Metering Code in Vic must be put in place if the obligation of providing the NTC by the MP is implemented and this must be preceding the update of MSATS. Vic Electricity Metering Code: 3.1 Changing tariffs If a distributor or a retailer wants to introduce a new distribution or retail tariff or change an existing distribution or retail tariff which requires new or different metering equipment or for existing metering equipment to be operated in a different manner, the distributor or the retailer must seek agreement with	Refer to section 4.5 in the POC Procedures Final Report and Determination

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				the retailer or distributor (as the case may be) prior to the introduction of the new tariff or change to an existing tariff.	
21.	Jemena			<p>Updating Network Tariffs</p> <p>AEMO proposes to make the updating of Network Tariff Code field mandatory for Metering Providers (MP). We do not support this proposal.</p> <p>MPs may know the details of the meter installation, but there is the likelihood of MPs not knowing the correct tariffs to apply as well as timing issues with the tariff updates. We believe this could potentially cause issues around increased volume of Network Billing exceptions and disputes.</p> <p>Assignment of network tariff is the LNSP's responsibility. AER requires distributors to assign the correct network to customers. LNSPs regulated revenues are dependent on the assignment of correct network tariffs. Moreover the purpose of network tariff in MSATS is for NMI discovery and quoting of retail pricing offers to customers.</p> <p>Should AEMO insist on requiring MPs to update the mandatory Network Tariff Code field, it would result in LNSPs still checking all network tariffs are correctly assigned. NZ experience indicates the level of billing exceptions and rework was high resulting in significant cost impacts to retailers and LNSPs.</p>	
22.	Momentum			<p><u>Network Tariff Codes:</u></p> <p>Momentum would like to support the argument to make the NTC as an optional or required (if known) field for the MP instead of making it a mandatory field for the MP.</p> <p>We support that MP can update the network tariff, however the LNSP must be the final owner of their Tariff Code.</p>	
23.	TASNetwork			<p><u>MSATS Procedures - Network Tariff Code</u></p> <p>TasNetworks believe that within CR30xx transactions (or any meter create/update transaction) Network tariff Code should be optional not mandatory. We note that across the industry there are a variety of arrangements and inconsistent knowledge within MPB, and to force MPB to enter a code when they do not know what to use will just introduce unnecessary changes to configuration.</p>	
24.	United Energy			<p>G6- Network tariff code 4.8.4</p> <p>UE note the comments on network tariff code and a desire to make the MP obligation to update the network tariff code at meter level mandatory. One participant questioned the need for this approach. UE see no reason why the MP is required to allocate the network tariff. We acknowledge the view of some participants that the MP knows the detail of the meter installation. However we believe that the MP often will not understand the available open tariffs within each jurisdiction, and so requiring them to select and apply the tariff correctly is unlikely to be practical. The end result is that the LNSP must still check all tariffs and seek to correct the tariffs if they do not match the configuration anyway.</p> <p>The original and ongoing purpose of the network tariff in MSATS is for NMI discovery and retail quoting for customers. The database of record for network tariff allocation to a NMI is the LNSP as this is where the financial transactions for network billing are generated.</p> <p>The more important aspect is to learn from the NZ practice where the level of billing rework was too high, and which had significant cost impacts for all parties, particularly retailers. It is important that the meter register information and the NMI suffix information is mandatory to allow the network tariff codes (or retail tariff codes) to be correctly and unambiguously allocated. Industry should agree that this has been achieved so that retailers and customers can be billed accurately. If this is not unanimously agreed by all of industry then these procedures should not be finalised. The clarity of datastreams and tariff application needs to be correct, poor performance in this area will undermine pricing signals to customers and customer confidence in the reform.</p>	
25.	AGL			<p>Network Tariff Codes</p> <p>In respect to the proposal by AEMO to make the Network Tariff Code mandatory for the MP to update, AGL believes that it is more appropriate for the field to be optional for the MP to update.</p> <p>AGL believes that where the meter changes are simple and there is adequate network tariff information to populate the field correctly, the FRMP can have the MP update that information as part of its contractual arrangements. However, where the meter change is complex, the MP can refer the installation back to the LNSP to establish the network tariff code.</p> <p>Another instance where the assumption is that the MC is contracted with the retailer. If the MC is contracted with the customer (not the retailer), then there is no guarantee of a contractual requirement to ensure this is done. However, the Retailer, LR and LNSP are financially affected by decisions made by the MC and should have a right to be aware of these.</p>	
26.	Red Lumo			AEMO will make the Network Tariff Code field mandatory for Metering Providers. AEMO is not proposing to specify any timeframes for the LNSP to update the Network Tariff Code.	

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				<p>Red and Lumo agree with the Network Tariff Code field being a mandatory field. Unless otherwise agreed between the LNSP and the MP, under certain circumstances, this obligation is to remain with the LNSP.</p> <p>In relation to the statement included within the Draft Report and Determination, 4.8.3 AEMO's assessment below:</p> <p>'AEMO notes concerns about MPs not having access to the Network Tariff Code information, and that LNSPs are not required by the NER to provide it to MPs.'</p> <p>Red and Lumo propose that the C4 report is provided to the New MPB at the requested status. This will assist the New MPB with the current information of a site and reduce the need to contact the LNSP.</p>	
27.	Energy Australia			<p>Network Tariff Codes</p> <p>EA does not agree that the Network Tariff Code (NTC) should be a mandatory field for the MP to update in MSATS as the MP may not necessarily have the NTC. We are supportive of this field being optional.</p> <p>EA does not think that updating a Market System with information that can create 'inefficiencies in the market' is best suited to be obligations in agreements. A better market outcome would be to ensure the owner of the NTC (i.e. the Network) is responsible for maintenance or this information.</p>	
28.	Pacific Hydro			<p>The LNSP, as the owner of the network tariff code, should be responsible for updating the network tariff code in MSATS. A process needs to be developed and documented within the Procedures that define how the LNSP will be advised of the metering configuration which will then allow them to update MSATS with the network tariff code within a specified timeframe. Obligation would also need to be placed on those participants responsible for advising the LNSP of the meter configuration.</p>	
29.	Active Stream	15.4	MPB Requirements	<p>(C) an obligation for the MP to update the NTC as mandatory is not supported by Active Stream. Active Stream believes this field should be optional for MPs, not mandatory.</p> <p>The responsibility should lie with the LNSP to update the NTC, with the ability for the MP to update the field with any corrections based on meter configuration installed.</p> <p>LNSPs may request MPs to perform these NTC updates on their behalf through commercial arrangements</p> <p>In order for an MP to be able to provide an accurate update to the NTC field, MP's would need to be provided with a mapping table of basic to interval NTC's, e.g. NTC B1 =I1</p>	
30.	AusNet Services			<p>Regarding 15.4 (c) refer comment 2 in general comments that recommends NTC being optional.</p> <p>Regarding 15.4 (e) change from meter read type to read type code, please refer comment 3 in general comments</p>	
31.	Vector			<p>Vector AMS support the obligation on the MPB to assign the Network Tariff Code as part of updating the metering installation details on any change to the metering installation.</p> <p>As the party that has performed the physical work on site the MPB is best placed to understand which metering register (and therefore datastream) is connected to which load or generation source being metered.</p> <p>To support this obligation, Vector AMS suggest that there is an obligation on the LNSP to provide clear guidelines to MPBs and FRMPs on the allocation of Network Tariff Codes for various metering installation configurations.</p>	
32.	Ausgrid	16.4	MPB Requirements	<p><u>Network Tariff Code - Update by MPB</u></p> <p>Ausgrid disagrees with the outcome of the consultation on this matter. Whilst it is agreed only the MPB can correctly identify the load type / supply arrangements supported by their metering, it is the LNSP who must apply and maintain the network tariff code. Even if the MPB does populate the network tariff code, the LNSP <u>MUST</u> be provided with sufficient information to validate it has been correctly applied.</p> <p>Should AEMO elect to retain its current position, then as an absolute minimum the industry requires:-</p> <ul style="list-style-type: none"> the network tariff code to be included in the C7 Report. Provide fields in MSATS that allow the validation of populated values (See 4.16 where Ausgrid has proposed the re-purposing of the 'LoadType' field) <p>Ausgrid believe the following outcomes will occur due to the AEMO determination:-</p> <ul style="list-style-type: none"> All MPB businesses need to develop logic and keep referential information in their systems to populate Network Tariffs Codes for the Networks they work in. This is a large overhead and would be seen as a 'barrier to entry' into the market. MPB's do not have experience in populating Network Tariffs and will result in:- <ul style="list-style-type: none"> Increases in Network Billing reconciliation issues. Network Billing disputes. 	

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				Increases in Meter Change Requests failing to load into MSATS (MPB choosing invalid Network Tariff Codes when Networks make them obsolete).	
33.	AusNet Services			Regarding 16.4 (e) refer comment 2 in general comments that recommends NTC being optional. Regarding 16.4 (g) change from meter read type to read type code please refer comment 3 in general comments	
34.	AusNet Services	17.4	MPB Requirements	Regarding 17.4 (e) refer to comment 2 in general comments that recommends NTC being optional. Regarding 17.4 (g) change from meter read type to read type code please refer comment 3 in general comments	
35.	AusNet Services	18.4	MC Requirements	Regarding 18.4 (e) refer to comment 2 in general comments that recommends NTC being optional. Regarding 18.4 (g) change from meter read type to read type code please refer comment 3 in general comments	
36.	AusNet Services	19.4	MC Requirements	Regarding 19.4 (e) refer to comment 2 in general comments that recommends NTC being optional. Regarding 19.4 (g) change from meter read type to read type code please refer comment 3 in general comments	
37.	AusNet Services	General	MDM Contributory Suffix	<p>General Comment (4)</p> <p>AusNet Services recommends the MDM Contributory Suffix must be supplied as a mandatory value for all relevant CATS transactions. We recommend also providing additional clarity regarding its use by stating that it is to be populated for each register of the meter installation thus ensuring full identification of each registers behaviour and purpose in the metering installation. DBs are often emailing MPs after a meter installation to resolve these situations.</p> <p>Additional clarity would be aided by including a definition of MDM Contributory Suffix in the Glossary that refers readers to Sections 6 and 7 of the NMI Procedure regarding its use, perhaps with examples of the types of values that are expected. eg. E1, E2, E3,... B1, B2, B3,... Q1, Q2, Q3,... K1, K2, K3....</p> <p>We consider that there will be will be two key benefits from this change:</p> <p>(1) Recipients of Meter Data Notifications (MDN) will be able to check the NMI Suffix of incoming interval data streams against each MDM Contributory Suffix in MSATS for a metering installation, thus helping to identify discrepancies between registers and datastreams and instigate corrective actions.</p> <p>(2) DBs will be able to use the MSATS metering installation configuration data to identify network tariff incompatibilities after a meter exchange has occurred. This will help reduce the frequency of costly and disruptive cancel re-bills for both networks and retailers when a tariff mismatch is eventually detected and the correct tariff reapplied.</p>	<p>AEMO agrees to make the 'MDM Contributory Suffix' field mandatory on all the Create CRs which are (2500,2501,2520,2521,3000,3001, 3004,3005,3080,3081,3090), however it will still be kept optional on the Update CRs for compatibility with existing records.</p> <p>The details in the MDM Contributory Suffix will no longer relate to the MDM datastream suffix table.</p> <p>The new definition of the MDM Contributory Suffix is: a suffix as per the NMI procedure to identify the stream of meter data, and is consistent with the suffix contained in the MDFF data file as opposed to the suffix recorded in the MDM datastream table.</p> <p>AEMO will be reviewing and updating the Standing Data for MSATS document to reflect this change as part of work package 3.</p>
38.	Endeavour Energy			Procedural improvement: We support United Energy's proposal to make the MDM Contributory Suffix field mandatory for all Change Requests that creates or modifies Meter Register information. This would include Change Requests 2500, 2501, 2520, 2521, 3000, 3001, 3004, 3005, 3050, 3051, 3080, 3081, 3090 and 3091. This is required to allow linking of the metering data to key standing data in MSATS.	
39.	Momentum			<p>Momentum supports the recommendation from UE to AEMO to consider moving the MDM Contributory Suffix from the "may be supplied" to the "must be supplied" category for this CATS CRs (2500,2501, 2520,2521,3000, 3001, 3004,3005,3050,3051,3080,3081,3090). This will have the effect of making the value mandatory in MSATS when establishing metering Installations. We recommend also providing additional clarity regarding its use by stating that it is to be populated for each register of the meter installation thus ensuring full identification of each registers behaviour and purpose in the metering installation. Additional clarity would be aided by including a definition of MDM Contributory Suffix in the Glossary that refers readers to Sections 6 and 7 of the NMI Procedure regarding its use, perhaps with examples of the types of values that are expected. eg. E1, B1, Q1, K1</p> <p>There will be will be two key benefits from this change: (1) Recipients of Meter Data Notifications (MDN) will be able to check the NMI Suffix of incoming interval data streams against each MDM Contributory Suffix in MSATS for a metering installation, thus helping to identify discrepancies between registers and datastreams and instigate corrective actions. (2) Networks will be able to use the MSATS metering installation configuration data to identify network tariff incompatibilities after a meter exchange has occurred. This will help reduce the frequency of costly and disruptive cancel-re-bills for both networks and retailers when a tariff mismatch is eventually detected and the correct tariff reapplied.</p>	
40.	AGL			<p>Contributory Suffix</p> <p>AGL also recommend moving the MDM Contributory Suffix from optional to mandatory within the CATS CR. This will have the effect of making the value mandatory in MSATS when establishing metering Installations. We recommend also providing additional clarity regarding its use by stating that it is to be populated for each register of the meter installation thus ensuring full identification of each registers behaviour and purpose in the metering installation. Additional clarity would be aided by including a</p>	

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				<p>definition of MDM Contributory Suffix in the Glossary that refers readers to Sections 6 and 7 of the NMI Procedure regarding its use, perhaps with examples of the types of values that are expected. e.g. E1, B1, Q1, K1</p> <p>We argue that there will be will be two key benefits from this change:</p> <p>(1) Recipients of Meter Data Notifications (MDN) will be able to check the NMI Suffix of incoming interval data streams against each MDM Contributory Suffix in MSATS for a metering installation, thus helping to identify discrepancies between registers and data streams and instigate corrective actions.</p> <p>(2) Networks will be able to use the MSATS metering installation configuration data to identify network tariff incompatibilities after a meter exchange has occurred. This will help reduce the frequency of costly and disruptive cancel-re-bills for both networks and retailers when a tariff mismatch is eventually detected and the correct tariff reapplied.</p>	
41.	United Energy			<p>G7 - Mandatory entry into MSATS of the NMI Suffix for each interval channel when a meter is installed</p> <p>To re-iterate the discussion in the workshop. UE believe the MDM Contributory Suffix in MSATS transactions CR25xx, 300x, 305x, 308x & 309x, should be a mandatory field, because clear identification of the NMI suffix is an important factor in correctly applying the Network tariff, and it is a valuable attribute in performing automated validation and quality control on the interval data streams when new meters are commissioned.</p>	
42.	Active Stream			<p>Active Stream recommend that AEMO consider moving the MDM Contributory Suffix from the “may be supplied” to the “must be supplied” category for this CATS CR. Active Stream are currently already doing this and support the position that it should be changed to ‘must’ rather than ‘may’.</p>	
43.	TasNetworks	8.6	MC Requirements	<p>TasNetworks believes that “MDM Contributory Suffix” should be mandatory within the following transactions; 2500,2501, 2520,2521,3004,3005,3050,3051,3080,3081,3090</p>	
44.	United Energy	13.4	LNSP Requirements	<p>[13.4]] As discussed in our General comments (G7) in the beginning of this response, the draft CATS procedures do not enforce mandatory population of MDM Contributory Suffix in MSATS.</p> <p>We recommend that AEMO consider moving the MDM Contributory Suffix from the “may be supplied” to the “must be supplied” category for this CATS CR. This will have the effect of making the value mandatory in MSATS when establishing metering Installations. We recommend also providing additional clarity regarding its use by stating that it is to be populated for each register of the meter installation thus ensuring full identification of each registers behaviour and purpose in the metering installation. Additional clarity would be aided by including a definition of MDM Contributory Suffix in the Glossary that refers readers to Sections 6 and 7 of the NMI Procedure regarding its use, perhaps with examples of the types of values that are expected. E.g. E1, B1, Q1, K1</p> <p>We argue that there will be will be two key benefits from this change: (1) Recipients of Meter Data Notifications (MDN) will be able to check the NMI Suffix of incoming interval data streams against each MDM Contributory Suffix in MSATS for a metering installation, thus helping to identify discrepancies between registers and datastreams and instigate corrective actions. (2) Networks will be able to use the MSATS metering installation configuration data to identify network tariff incompatibilities after a meter exchange has occurred. This will help reduce the frequency of costly and disruptive cancel-re-bills for both networks and retailers when a tariff mismatch is eventually detected and the correct tariff reapplied.</p>	
45.	United Energy	15.4	MPB Requirements	<p>Feedback Point A:</p> <p>(15.4) We recommend that AEMO consider moving the MDM Contributory Suffix from the “may be supplied” to the “must be supplied” category for this CATS CR. This will have the effect of making the value mandatory in MSATS when establishing metering Installations. We recommend also providing additional clarity regarding its use by stating that it is to be populated for each register of the meter installation thus ensuring full identification of each registers behaviour and purpose in the metering installation. Additional clarity would be aided by including a definition of MDM Contributory Suffix in the Glossary that refers readers to Sections 6 and 7 of the NMI Procedure regarding its use, perhaps with examples of the types of values that are expected. e.g. E1, B1, Q1, K1</p> <p>We argue that there will be will be two key benefits from this change: (1) Recipients of Meter Data Notifications (MDN) will be able to check the NMI Suffix of incoming interval data streams against each MDM Contributory Suffix in MSATS for a metering installation, thus helping to identify discrepancies between registers and datastreams and instigate corrective actions. (2) Networks will be able to use the MSATS metering installation configuration data to identify network tariff incompatibilities after a meter exchange has occurred. This will help reduce the frequency of costly and disruptive cancel-re-bills for both networks and retailers when a tariff mismatch is eventually detected and the correct tariff reapplied.</p> <p>Feedback Point B:</p> <p>(15.4) As per UE’s general comments (G6) in the introduction to this response, UE see no reason why</p>	<p>With regards to making the Register ID mandatory, this field is already mandatory on the suggested CRs</p>

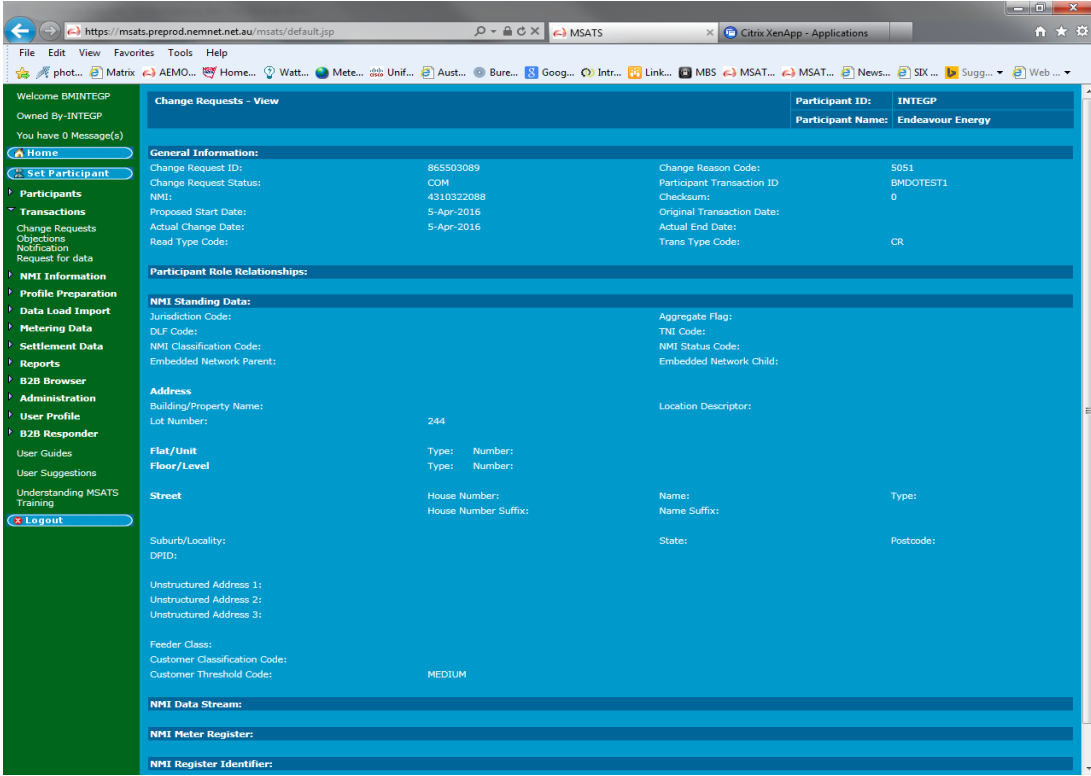
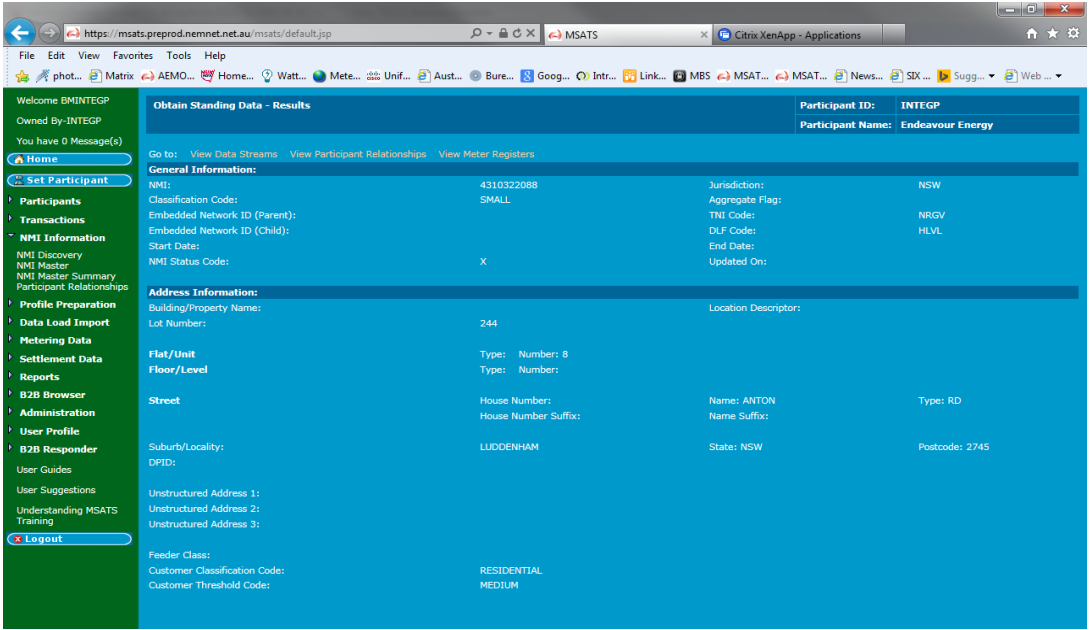
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				<p>the MP is allocating the network tariff, the MP may also not understand the available open tariffs within each jurisdiction which will create work for the LNSP to maintain the tariff codes in MSATS.</p> <p>The original and ongoing purpose of the network tariff in MSATS is for NMI discovery and retail quoting for customers. The database of record for network tariff allocation to a NMI is the LNSP as this is where the financial transactions for network billing are generated.</p> <p>The more important aspect is to learn from the NZ practice where the level of billing rework was too high, this will impact costs for all parties, particularly retailers. It is important that the meter register information and the NMI suffix information is mandatory to allow the network tariff codes (or retail tariff codes) to be correctly and unambiguously allocated to each datastream. Industry should agree that this has been achieved some that retailers and customers can be billed accurately. If this is not unanimously agreed by all of industry then these procedures should not be finalised. The clarity of datastreams and tariff application needs to be correct.</p>	
46.	Aurora	16.4	MPB Requirements	MPB requirements to make Suffix a mandatory field as well as the register ID, this will help participants identify the data stream against the register. For example Reg 1 Suffix E1, this enables participants to confirm the for example if the stream is generation (B1)/ consumptive (E1). Remove Suffix from the “may” section.	
47.	Aurora	17.4	MPB Obligations	MPB requirements to make Suffix a mandatory field as well as the register ID, this will help participants identify the data stream against the register. For example Reg 1 Suffix E1, this enables participants to confirm the for example if the stream is generation (B1)/ consumptive (E1). Remove Suffix from the “may” section.	
48.	Aurora	18.4	MPB Requirements	MPB requirements to make Suffix a mandatory field as well as the register ID, this will help participants identify the data stream against the register. For example Reg 1 Suffix E1, this enables participants to confirm the for example if the stream is generation (B1)/ consumptive (E1). Remove Suffix from the “may” section.	
49.	Aurora	19.4	MC Requirements	MC requirements to make Suffix a mandatory field as well as the register ID, this will help participants identify the data stream against the register. For example Reg 1 Suffix E1, this enables participants to confirm the for example if the stream is generation (B1)/ consumptive (E1). Remove Suffix from the “may” section.	
50.	Aurora	20.4	MC Requirements	MC requirements to make Suffix a mandatory field as well as the register ID, this will help participants identify the data stream against the register. For example Reg 1 Suffix E1, this enables participants to confirm the for example if the stream is generation (B1)/ consumptive (E1). Remove Suffix from the “may” section.	
51.	AGL	General	Embedded Network NMIs	<p>Embedded Network NMIs</p> <p>The whole purpose of creating new Embedded Network NMIs was to identify EN children separately from the network and clearly identify which network they are associated with.</p> <p>If a connection moves from being network connected to EN connected, then the obligations and potential costs and processes for managing that embedded network child change as a result of that child moving to an EN. Therefore abolishing the LNSP NMI and creating a new EN NMI seems appropriate and will ensure that child NMIs are clearly identifiable.</p> <p>AEMO have noted that NMIs should only be made extinct when the NMI is abolished. However, the process of moving the NMI from an LNSP connection to an EN connection moves that NMI from one network (the LNSP) to another network (the Embedded Network) and therefore the NMI has been abolished as far as the network is concerned.</p> <p>AEMO has stated that ‘It was confirmed that all retailers... would have to accommodate complex and costly processes should a NMI need to be made extinct.’.</p> <p>AGL seeks clarification on the analysis and source of information provided which underpins this statement.</p>	AEMO notes all participant comments related to this issue, and will consider it when updating the NMI Procedure as part of work package 2.
52.	Momentum			<p><u>Embedded Network Transition and Readiness:</u></p> <p>The process needs to be clarified whether a NMI will be abolished for child NMIs to make them a part of embedded network.</p>	
53.	TASNetwork			<p><u>Re-use of NMI when an Embedded Network is created.</u></p> <p>TasNetworks believes that the electrical works required to create an embedded network from an existing set of NMI alters the connection point. To re-use the NMI violates the rules outlined in the NMI Procedure both from the perspective of the new connection point, and from the point of “shifting the LNSP boundary”.</p>	

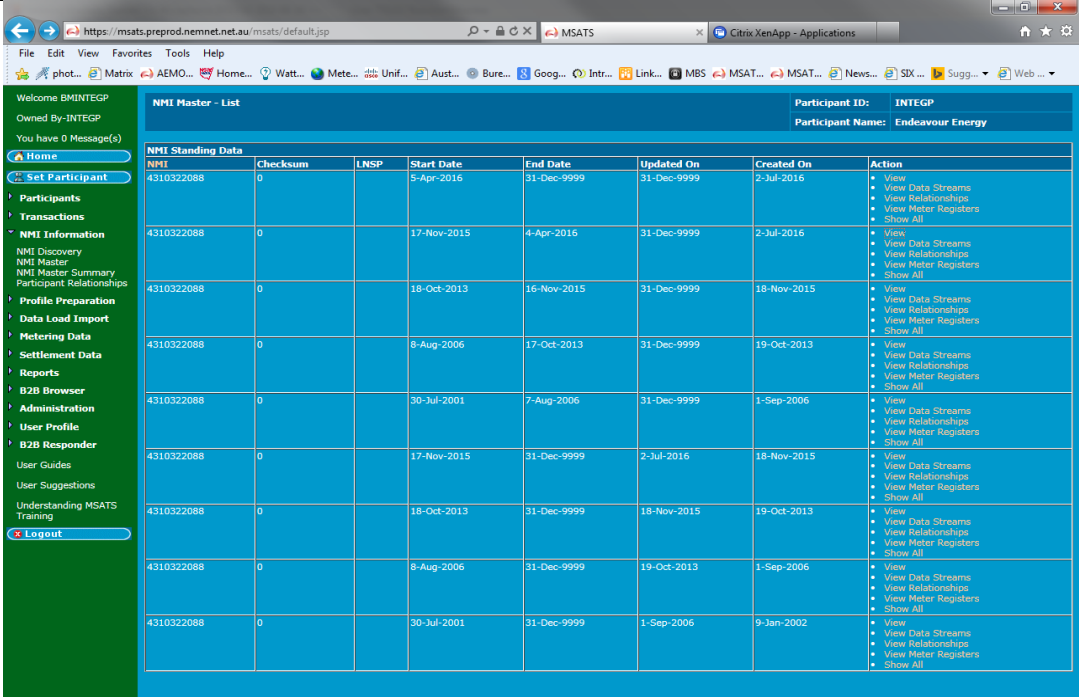
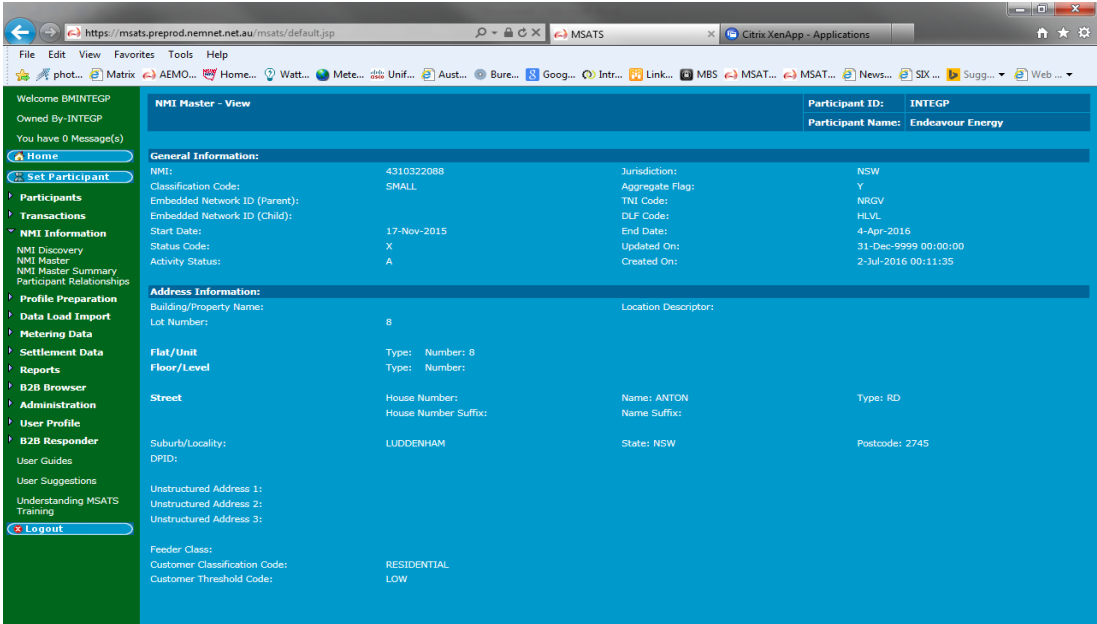
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				<p>11.3 A NMI cannot be reassigned to another connection point. It is NOT acceptable to reallocate NMIs to accommodate changes to IT systems, changes to assumed associations, changes to network tariffs and charges, changes to LNSP boundaries or because the LNSPs allocation system has changed</p> <p>The existing NMI should be made extinct. Additionally CR 5090/5091 should be removed from the CATS procedure.</p>	
54.	United Energy			<p>G4 - EN transition and readiness 4.3.4</p> <p>UE recognise the uncertainty created with regard to the transition of arrangements for ENs and EN customers. The AEMC rule change suggests that the AEMO guidelines will be developed to account for ENM NMI allocation however this we understand is a key deliverable in pack 2 due on 1 March 2017. The NMI allocation procedures will need to deal with the following:</p> <p>The NMI ranges that will and are allocated for each ENM and how the NMI range can be linked back to a jurisdiction and LNSP area:</p> <ul style="list-style-type: none"> Clarify when the new EN NMI ranges will be used i.e. for all new greenfields EN established from 1 Dec 17, all existing EN when an off market child with an LNSP NMI goes on market, when existing LNSP NMIs are used and connections become off market when an EN is created, children that remain on market retain the LNSP NMI Where LNSP NMIs for off market children are going on market or newly created brown fields NMIs, the NMIs will need to be made extinct in the LNSPs systems to ensure that no more activities or data updates occur against the NMI even if the same NMI exists being managed by an ENM. LNSP systems do not cater for LNSP role churn. <p>The transition of the LNSP out of the EN LNSP and RP,MP and MDP role can only occur after the following activities have been completed:</p> <ul style="list-style-type: none"> ENM SLP and guideline and accreditation documentation has been finalised on 1 March 2017; The prospective ENMs have reviewed the documentation and developed their accreditation responses and can demonstrate capability say by mid-2017; AEMO has accredited the ENM so the ENOs are able to appoint accredited parties by say end August; The ENOs engage an ENM to commence operation from 1 Dec 17 and advise the impacted parties LNSP, FRMP current RP, MP and MDPs for all parent and children NMIs by end September; The LNSP and child FRMPs agree the transfer of RP and MP/MDP roles and the outage timeframes and financial arrangements to changeover type 5 interval or Vic AMI meters close to 1 Dec 2017, this needs to occur by the start of November; The FRMP coordinates the retailer planned interruption notifications to the customers and ENO/ENM by mid Nov 17 for a 1 Dec 17 meter changeover; and The new ENM is appointed for all on market children and takes on the ENM role on 1 Dec 2017 at the same time as the LNSP makes the same NMIs extinct in its systems and the meter exchanges and other role changes occur. The FRMPs update the MC and MP/MDP roles. <p>Whilst the above is an indicative timeline of tasks, this work needs to be completed while internal and industry testing are progressing, data conversion/change activities for the MC and meter types etc. and the necessary accreditations as MC and B2B parties are occurring.</p> <p>The complexity of these transition activities should not be underestimated when seeking to engage with ENO and customers for access and outages within shopping centres and retirement villages etc. The complexity of closure in some form of an LNSP NMI within the LNSP systems while leaving the same NMI operational in the market should not be underestimated. These planning activities warrant a dedicated planning activity in their own right.</p>	
55.	Energy Australia			<p>Embedded Network NMIs</p> <p>The whole purpose of creating new Embedded Network NMIs was to identify EN children separately from the network; so abolishing the LNSP NMI and creating an EN NMI seems appropriate and will ensure that child NMI is clearly identifiable.</p>	
56.	CitiPower & Powercor, SAPN			<p>CP/PAL & SAPN understand that AEMO will be considering the following topic as part of Work Package 2 but wanted to re-enforce our previous position and correspondence with regards to the use of DNSP NMI's within Embedded Networks.</p> <p>CP/PAL & SAPN do not support the re-use of a NMI allocated and assigned to a customer directly connected to our Network as a Child NMI within an Embedded Network. Physical changes to wiring will be required at the site to enable this to occur and as part of that process, a new NMI should be established for the Child connection and the customers previous DNSP NMI made extinct. This approach will enabling the new relationships to be clearly established for the Child NMI and not create</p>	

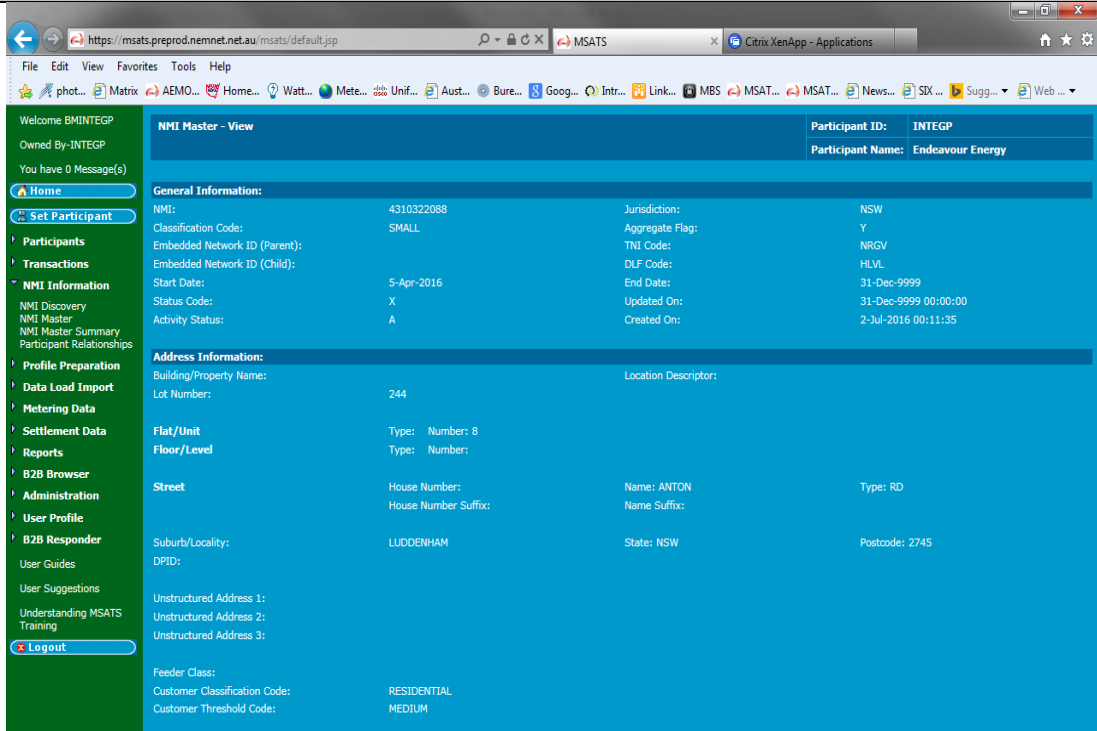
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				any confusion for the Industry with regards to the relationships prior to this significant change in electricity supply arrangements at the site.	
57.	Endeavour Energy	CATS Procedures		<p>Please find below test results from the MSATS pre-prod environment showing that retrospective changes can be made for an extinct NMI.</p>  <p>The standing data updated in this transaction was the add lot number to the address and the Customer Threshold Code was changed to Medium.</p>  <p>NMI Discovery shows updated data.</p>	

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				<div><p>NMI master list shows new record created on 2/7</p><p>NMI master view (end date 4/4/16) shows previous standing data set.</p></div>	

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				<div></div> <p>NMI master view (start date 5/4/16) shows updated standing</p>	
58.		Maintain NMI – Make NMI a Child NMI – SMALL OR LARGE	<p>Embedded Network Rule Change:</p> <p>We submitted comments in the initial consultation and have noted AEMO’s response and wish to provide further feedback.</p> <p>In the draft determination report AEMO stated that ‘AEMO considers that a NMI should only be made extinct when it is abolished.’ This we partially agree with – we wish to clarify that consistent with the current NMI Procedure we believe that ‘if a connection point is abolished the NMI becomes extinct’, note that the status of the connection point, and not the NMI, determines if the NMI should be extinct.</p> <p>AEMO goes on to say that ‘Moving the NMI from an LNSP network to an embedded network does not create a new connection point or abolish an existing connection point; it is the same connection point.’ At the AEMO workshop on 7 July 2016 AEMO provided an example which was a shop within an existing shopping centre and explained that when the shop is converted to be within an embedded network the metering switchboard may not change when a new meter is installed just after the network connection point. AEMO was of the view that in this example the connection point did not change. Given the example provided by AEMO we agree that the metering installation has not changed but the connection point has changed. The term connection point is more than the physical network connection point as AEMO described in the example, it is defined in the NER as the agreed point of supply and is used in practice to delineate the boundary of responsibilities. In the example provide by AEMO the agreed point of supply has changed because the LNSP is no longer responsible for the metering installation. It is the embedded network operator, as an exempted network service provider, who is now responsible for this metering installation.</p> <p>Procedural improvement: Allowing a market NMI to become a Child NMI would cause significant system and procedural issues because they have been designed to comply with clause 11.3 of National Metering Identifier Procedure which states (bold text added for emphasis):</p> <p>‘A NMI cannot be reassigned to another connection point. It is NOT acceptable to reallocate NMIs to accommodate changes to IT systems, changes to assumed associations, changes to network tariffs and charges, changes to LNSP boundaries or because the LNSPs allocation system has changed.</p> <p>While a customer may change their elected FRMP, the NMI for a connection point remains constant throughout its market life. If a connection point is abolished the NMI becomes extinct, and hence each NMI has a start date as well as an end date and associated change control. Where a customer changes</p>		

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				<p>the physical location of the connection point a new NMI must be allocated. The “old” NMI is decommissioned on AEMO’s Metering Register and the “new” NMI commissioned accordingly.’</p> <p>For an existing market NMI to change to a Child NMI the physical location of the connection point is usually changed, and in all cases the agreed point of supply with the LNSP has changed. Therefore the current obligation and business practice of making the market NMI extinct and creating a new Child NMI should continue.</p> <p>AEMO suggested that when a NMI was to be made extinct then retrospectivity in MSATS would be disabled, however this is incorrect because it is still possible to make changes in MSATS for the period that the NMI is still active. Please refer to the test results at the end of this document which demonstrates this.</p> <p>AEMO also stated that ‘... it was confirmed that all retailers, MDPs and MPs would have to accommodate complex and costly processes should a NMI need to be made extinct and a new NMI created’. However AEMO’s proposal would also introduce complexity and cost for LNSPs, MDPs and MPs too.</p> <p>We would suggest that when a market connection point become a Child connection point the LNSP extinct the market NMI and the ENM create a new Child NMI if required.</p>	
59.		Change Role – Change LNSP – SMALL OR LARGE		<p>Embedded Network Rule Change:</p> <p>Procedural improvement: Following on from our feedback to clause 30 we would suggest that wording be included here to not allow the change of LNSP for the scenario of converting an existing market NMI to a Child NMI.</p>	
60.	AGL	General	ENM & Parent NMI	Process for managing child NMIs by the ENMs needs further review. NSP2 role would work appropriately for Embedded Networks.	<p>The ENM is not a party associated with the parent NMI(s) in MSATS, nor does the ENM have any rights to data or any responsibilities for the management of data at the parent NMI(s). Hence AEMO does not believe the NSP2 field should be used to hold the ENM on the Parent NMI.</p> <p>AEMO will publish a list of Embedded Networks, along with its associated Embedded Network Operators, DLF codes and TNI codes. AEMO believes the list will assist participants in identifying the ENM of an Embedded Network.</p>
61.	Red Lumo			<p>Embedded Network Rule Change:</p> <p>Previously it’s been suggested by Red and Lumo that the NSP2 role for a Parent NMI is updated with the ENM participant ID. AEMO indicated in its Draft report that this field is limited to wholesale NMIs to store the DNSP. At this point in time, it would be beneficial to review expanding the use of the NSP2 field for the Parent NMI so that the ENM is identifiable within MSATS. New roles have not been created for a Metering Coordinator or Embedded Network Manager.</p>	
62.	TASNetwork			<p>ENM & Parent NMI</p> <p>TasNetworks note the AEMO’s comments regarding wholesale nmi use of NSP2 & that it should not be used to house ENM and would make the following observations;</p> <p>Wholesale NMI represent the boundary between two networks, the Transmission and Distribution. To accommodate the need to reference both network managers, NSP2 is used to house the downstream Network Manager ie DNSP and LNSP is used to house the upstream network manager, ie TNSP.</p> <p>A parent NMI for an embedded network is the same scenario, ie a boundary of two networks, the Distribution and the Embedded Network. There is a similar need to house both network managers. It makes sense to house the downstream network manager in NSP2, ie the ENM and the LNSP continue to be used to house the upstream network manager, ie the DNSP.</p>	
63.	Pacific Hydro			At the PoC-PWG meeting on 7 July 2016 the ability to identify the ENM at the Parent NMI was discussed and it had been suggested the NSP2 role be used for this purpose and available through NMI discovery. AEMO advised this was not possible and that AEMO would manage and make available to participants a list of ENMs. This appears a cumbersome process and issues with timely updates and accuracy are of concern. It is suggested that the use of the NSP2 role be reviewed or an alternative sought.	
64.	AGL	General		<p>For all CRs with a proposed date, a 1500 CR is also required to be submitted with the actual change date.</p> <p>Any activity with a proposed change date may not occur on that proposed change date, therefore the CR 1500 is required to update the market with the actual change date.</p> <p>This is not clear in the various CR descriptions.</p>	AEMO clarifies that where a CR1500 is required, the MDP will get a request to provide it (i.e. clause 7.5 (b)). CR1500 is not required for type 7 metering installation hence it is not appropriate to specify it on every CR.
65.	AGL	General		The numbering in the response template versus the second stage document is misaligned form CI 7 onwards, and some comments may be incorrectly allocated within this response as a result.	Noted
66.	Momentum	General		C4 for Role Changes (CR 6800):	

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			C4 report to new MDP	<p>Momentum supports Metering Providers recommendation that it would be beneficial to supply the C4 report (normally provided at the completion of a role change) to the New MPB at the requested (REQ) stage to allow give them visibility of the current configuration in MSATS.</p> <p>This would provide the current Network Tariff Codes (NTC) associated with the site, facilitate easier alignment of new configuration to existing and support publication of NTC by the MPB. This change would also reduce the need to query LNSP for information via email or SMP transaction moving forward.</p> <p>Please note that as a Retailer, we must continue getting C4 at COM stage and not at REQ stage.</p>	<p>As C4 reports specifications are not part of the MSATS procedure, AEMO will be referring this suggestion to the project technical workstream for consideration.</p> <p>However AEMO would like to note that the project technical workstream is currently considering the addition of the NTC to the output of the C7 report which the MPB can run once they are nominated on a change request. There seems to be no benefit in the MPB getting a C4 report at REQ stage as they will get a C4 at COM stage (assuming they are nominated on the change request), and they cannot update MSATS until the change request completes (i.e. they become the current active MPB).</p>
67.	United Energy			<p>G10 – C4 report to new MDP</p> <p>General comment:</p> <p>It would be highly beneficial to make available the C4 report normally provided at the completion of a role change to the New MPB at the requested stage to allow give them visibility of the current configuration in MSATS. This would provide the current Network Tariff Codes (NTC) associated with the site, facilitate easier alignment of new configuration to existing and support publication of NTC by the MPB. This change would also reduce the need to query LNSP for information via email or SMP transaction moving forward.</p>	
68.	Origin			<p>Consideration needs to be given to expanding the existing reports and Change Requests to additional participants as the needs are identified throughout the development of the Power of Choice work.</p> <p>One example is to make the C4 report available to a nominated MDP ahead of the work being completed instead of just after it is completed. This would facilitate the existing configuration to be reviewed ahead of a meter change rather than waiting for an issue to be identified post install – where the required information is readily available in the market and needs to be made available to additional participants</p>	
69.	Red Lumo		Quick Reference Guide	<p>Inclusion of the following within the Glossary, including 'Embedded Network' for ENC and ENP, i.e. Embedded Network Child and Embedded Network Parent, respectively</p> <p>Notes: EN: Embedded Network, ENC: Child NMI, ENP: Parent NMI</p>	As ENC and ENP are only used in the Quick Reference Guide section, and they are not used anywhere else, they will be replaced with the long terms. AEMO considers that there is not sufficient cause to warrant adding them to the glossary.
70.	ActewAGL		How to Use this Document	2.4 (k) and (q) say the same but one has MPB, the other MP. This is throughout the document. Do they have the same meaning? If it relates to the role in MSATS, then MPB, otherwise if referring to participant, MP. Same rule applies to MC and RP.	Agreed
71.	Ergon		How to Use this Document	In the example table on page 5, Ergon Energy recommends that “NMI size” should be changed to “NMI classification”, as ‘classification’ is the correct term when referring to types of NMIs.	Agreed
72.	AusNet Services	1.4	Related Documents	Why has the standing data document been removed from here? This document has direct relevance to the CATS procedures as it provides participants with information regarding standing data and what sits in each of the 5 msats tables.	<p>The document has not been removed, in the table there is a reference to the “Standing Data for MSATS” document and the link to the document as well</p> <p>Participants should also note that the list in the table will be alphabetised for the final published version.</p>
73.	Pacific Hydro	2.1	General Obligations	<p>There are two new entities in the market; ENM and MC. As these are not being recognised in MSATS i.e. the MC is taking on the RP role and the ENM is taking the LNSP role, these need to be stated clearly in section 2 under their obligations.</p> <p>There needs to be a clear link between the Rules obligations of the parties and the obligations which are placed on the roles they are adopting in the Procedures. For example the distributor may have an obligation in the Rules to update the customer threshold but does the ENM have that same obligation in the Procedures?</p>	<p>The relationship between the MSATS Role Code (e.g RP) and the Market role (e.g Metering Coordinator) is clarified in section 4.3, no reference to the Role Code is made prior to this section. AEMO considers that the procedure provides a clear link between the market role and the role code in the current drafting. This link is strengthened further throughout the remainder of the procedure.</p> <p>Section 2 deals with the obligations on both LNSP and ENM which includes customer threshold, CR processes enable parties to meet these obligations.</p>
74.	AGL	2.1	General Obligations	<p>There is no reference to system data inputs up to 11.59 pm etc.</p> <p>MSATS system timeframes are not clear within the procedure and lodging a CR pre 00:00 and post 00:00 has substantially different outcomes on the market.</p>	No changes have been made regarding requirements for timeframes, no additional requirements have been determined through this consultation. AEMO is unaware of any issues in the market that need to be addressed in this area
75.	AusNet Services	2.1	General Obligations	<p>Still believe another clause should exist in here. Response from AEMO did not address our comment. AusNet Services believes that a general obligation around objections should be included since it has been removed from the specific role obligations.</p> <p>Wording could be something like this:</p> <p>A Participant may object to a change request by using a valid objection code and adhering to objection rules as per objection rules table for each change request.</p>	Agreed
76.	Pacific Hydro	2.1	General Obligations	Suggest the following rewording:	AEMO considers the current clause wording is clear and does not need to change

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				(e) A CATS Participant must not select an the Objection Code which applies to the reason for objection and must be able to produce evidence, upon request, to substantiate the use of an Objection Code. unless the Objection is fair and reasonable.	
77.	Ergon	2.1	General Obligations	<p>In clause 2.1(a):</p> <p>“Participants must select the most applicable Transaction Type Code for their proposed transaction.”</p> <p>For consistency with common terminology, Ergon Energy recommends the section includes “Change Request Code” as below:</p> <p>(a) Participants must select the most applicable Transaction Type / <u>Change Request Code</u> for their proposed transaction.</p> <p>Further, in the below clause we recommend deletion of the highlight word.</p> <p>2.1 (j) CATS Participants must consider and action as necessary within two business days any requests from Participants that they have been incorrectly assigned CATS Participants Roles.</p>	Agreed
78.	Active Stream	2.2	Financially Responsible Market Participant	The numbering is not consistent	The numbering seems consistent throughout section 2.2
79.	AGL	2.2	Financially Responsible Market Participant	Clause (r): Notification of remote service only applies to current FRMP, doesn't include an obligation on the incoming FRMP who may reconnect a meter remotely for an incoming customer.	Whilst parties may agree that a notification or other process that is provided for in this procedure is to be used to enable a party to meet an obligation in the NERR or other instrument, it is unnecessary to re-state the obligation in the MSATS procedures, accordingly clause 2.2(r) has been removed.
80.	Ausgrid			<p>Clause (r): The requirements specified in this clause are not consistent with the NERR. Rule 104 in the NERR states:-</p> <p>“If the retailer has <u>arranged</u> to de-energise a customer's premises remotely in accordance with the energy laws, the retailer must as soon as practicable after the de-energisation notify the distributor of the remote de-energisation <u>and the reason for the de-energisation</u>, except where the de-energisation is as a result of the <u>distributor's request</u>.”</p> <p>There are a number of points that need to be rectified:-</p> <ul style="list-style-type: none"> • “As soon as practicable” is not a service level and as such a timeframe needs to be specified in the MSATS procedures. Ausgrid suggests 2 hours. • The NERR clearly states that the “reason for the de-energisation” must be provided to the LNSP. This is not reflected in the draft. • The exception case is where “the de-energisation is as a result of the distributor's <u>request</u>”, not having been “<u>performed</u> by the LNSP”. The clause needs to be corrected to reflect the Rules requirement. <p>Suggested rewording:-</p> <p>Clause (r): Ensure the LNSP is notified within 2 hours of requesting the remote disconnection or reconnection of a connection point, and in the case of a disconnection, the reason for the disconnection.</p> <p>Clause (new): Ensure the LNSP is notified within 2 hours of a remote disconnection or reconnection being completed except where the disconnection or reconnection was initiated by the LNSP.</p> <p>Ausgrid maintain there is also a need for the LNSP to be advised of a pending disconnection and/or reconnection to facilitate efficient call centre procedures.</p> <p>Ausgrid also notes there is no obligation on the FRMP to update MSATS and these requirements and timeframes are better placed in the B2B Procedures.</p>	
81.	Endeavour Energy			<p>We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback and provide an alternative suggestion.</p> <p>The notification of a remote disconnection is required in near real time to minimise investigation costs and to provide a quicker response for outage enquiries from a customer. The quickest way to receive the notification is to get it from the party who performed the remote disconnection. We suggest that the obligation on the retailer is to ensure that the notification is provided instead of obligating the retailer to provide the notification themselves.</p> <p>Procedural improvement: We suggest that clause 2.2.r be reworded to:</p> <p>“Ensure the LNSP is informed when a <i>connection point</i> is remotely <i>disconnected</i> or remotely <i>reconnected</i> unless the remote <i>disconnection</i> or remote reconnection has been arranged by the LNSP.”</p>	
82.	Jemena			<p>Clause 2.2 (s) does not prescribe a timeframe for the FRMP to notify LNSP of disconnection. It is crucial that LNSPs are advised in real time.</p> <p>There is no obligation on the FRMP to notify LNSPs of de-energisation (as distinct from disconnection). Jemena recommends the procedures prescribe an obligation on FRMPs to notify of disconnection and de-energisation in real time. Where such notifications are not received in a timely manner, Jemena may</p>	

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				respond to calls from customers who report that they have lost supply. Should there be a wasted truck visit', the FRMP will be charged a 'wasted truck visit' charge.	
83.	Momentum			<p>(s)(r) Inform the LNSP when a <i>connection point</i> is remotely <i>disconnected</i> or remotely <i>reconnected</i> unless the remote <i>disconnection</i> or remote <i>reconnection</i> has been performed by the LNSP.</p> <p>How would the current FRMP know if there is a remote re-en (say move in of a new customer with another Retailer) raised by the New FRMP?</p>	
84.	Origin			<p>Origin</p> <p>(s) Inform the LNSP when a <i>connection point</i> is remotely <i>disconnected</i> or remotely <i>reconnected</i> unless the remote <i>disconnection</i> or remote <i>reconnection</i> has been performed by the LNSP.</p> <p># This shouldn't be a FRMP obligation – should sit with the</p> <p>Refer to section 4.6</p> <p>FRMP will not be aware of the remote re-en when triggered by a pending new retailer and the transfer then doesn't complete. The MC would only do the re-en when there is a pending transfer in the market but if this is cancelled then no party would be advising the LNSP of the completed remote re-en</p>	
85.	Pacific Hydro			With regard to clause (r), the New FRMP, as part of the transfer process for a move-in transfer, can send a service order to remotely re-energise the site. Therefore an obligation should be placed on the New FRMP to inform the LNSP.	
86.	Red Lumo			<p>The Current FRMP must ... (r) Inform the LNSP when a <i>connection point</i> is remotely <i>disconnected</i> or remotely <i>reconnected</i> unless the remote <i>disconnection</i> or remote <i>reconnection</i> has been performed by the LNSP.</p> <p>This clause has placed an obligation on the Current FRMP to provide notification of a remote disconnection or reconnection; however there is no change request available to facilitate this obligation. A reconnection can be arranged by the Current or New FRMP, its inclusion is limited to the Current FRMP. This is allowed in both rule 106A of the NERR, rule 7.3.2(i)(3)(i) of the NER and S7.5.1.1 as allowable in the Minimum Service Specification.</p> <p>On the above basis, we recommend that an obligation be placed on the incoming retailer, equivalent to the obligations placed on the current FRMP.</p> <p>The New FRMP must:</p> <p>... (iA) inform the LNSP when a <i>connection point</i> is remotely <i>reconnected</i> unless the remote reconnection has been performed by the LNSP.</p>	
87.	TasNetworks			2.2 (r) - should be removed if meter contactor status now at meter level and updating MSATS is an MPB obligation	
88.	Jemena			<p>In the draft report and determination AEMO notes:</p> <p>“Remote Disconnection/Reconnection Notification</p> <p>AEMO notes that, as per the NERR, the obligation is on the retailer to notify the distributor of remote disconnection and remote reconnection, therefore, AEMO removed this obligation from the Metering Coordinator in MSATS.</p> <p>AEMO does not think it necessary to specify timeframes for the FRMP obligation to notify the LNSP of remote disconnection and remote reconnection as the NERR provide sufficient guidance on the timeframes for those notifications.”</p> <p>The NERR does not apply. The Victorian Government has not fully implemented NECF. Therefore it is necessary to specify timeframes for the FRMP to notify the LNSP of remote disconnection and remote reconnection.</p>	
89.	Ausgrid	2.3	Local Network Service Provider	<p>There is no reciprocal requirement for an LNSP to notify the FRMP in the event that an LNSP initiates the remote disconnection or reconnection of a connection point.</p> <p>Suggested new clauses:-</p> <p>Clause (new): Ensure the FRMP is notified within 2 hours of requesting the remote disconnection or reconnection of a connection point, and in the case of a disconnection, the reason for the disconnection.</p> <p>Clause (new): Ensure the FRMP is notified within 2 hours of a remote disconnection or reconnection being completed except where the disconnection or reconnection was initiated by the FRMP.</p> <p>Whilst these changes are not specifically supported by the Rules, there is a need for the FRMP to be advised when and why an LNSP has initiated a remote disconnection or reconnection.</p> <p>Ausgrid also notes as there is no obligation on the FRMP to update MSATS, these requirements and timeframes are better placed in the B2B Procedures.</p>	

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90.	Origin			Where the LNSP has requested a remote re-en or de-en there is no obligation for the LNSP to advise the FRMP. The FRMP has the obligation under 2.2 to advise the LNSP so there should be an equal obligation that the FRMP is advised when they have not triggered the work.	
91.	Red Lumo			<p>The NERR that is effective 1 December 2017 indicates that the Distributor is to provide the reason for the de-energisation if it is not at the Retailer's request (see rule 104(1) below). This obligation has not been placed onto the Distributor within this section. If the inclusion of the NERR obligations will proceed for the FRMP, then this will need to be updated accordingly to reflect the LNSP's obligation. Currently the CR to update a NMI status cannot provide the reason for the de-energisation. Red and Lumo recommend that this be added to the MSATS Procedures and associated CR updates.</p> <p>104 Notification of de-energisation</p> <p>(1) If the distributor de-energises a customer's premises in accordance with the energy laws, the distributor must as soon as practicable after the de-energisation notify the retailer of the de-energisation (including whether the premises were de-energised manually or remotely) and the reason for the de-energisation, except where the de-energisation is as a result of the retailer's request.</p>	
92.	ActewAGL	2.3	Local Network Service Provider	<p>(c) The LNSP can no longer adopt this role, so reword statement;</p> <p>(c) Apply the Roles nominated by the FRMP for MC, who appoints the MPB, MPC, and MDP as required by the NER.</p>	Paragraph (c) will be deleted as it refers to a transitional arrangement in the NER where LNSP becomes the initial metering coordinator for meter types 5 and 6
93.	Red Lumo			<p>The following clause references the NER, this should include the relevant clause of the NER:</p> <p>The Current LNSP must:</p> <p>c) Adopt the Role of MC who appoints the MPB, MPC, and MDP as required by the NER.</p>	
94.	AGL	2.3		<p>2.3(m) AGL queries why the LNSP is responsible for ensuring network tariff codes are stored in MSATS as this is now the responsibility of the Meter Provider, although AGL notes the comments made at the workshop of 7 July and strongly prefers the LNSP to be responsible for network tariffs.</p> <p>AGL also notes Ausgrid's comments about repurposing the controlled load field. If MPs are to apply network tariffs then a process will be required to support this proposition.</p> <p>It is also likely that even with support MPs will only be able to populate network tariff codes for simple installation and that the LNSP will be required to populate the code with network tariffs for the more complex situations.</p> <p>Therefore LNSPs should also have the ability to update the network tariff code.</p> <p>Further, in supporting MPs providing the network tariff, it would be very beneficial to supply the C4 report normally provided at the completion of a role change to the New MPB at the requested stage to allow give them visibility of the current configuration in MSATS.</p> <p>This would provide the current Network Tariff Codes (NTC) associated with the site, facilitate easier alignment of new configuration to existing and support publication of NTC by the MPB. This change would also reduce the need to query LNSP for information via email or SMP transaction moving forward.</p>	<p>The LNSP still has the obligation of providing and maintaining the network tariff code, however in MSATS the MP is required to update the NTC relative to the changes being undertaken at a metering installation.</p> <p>As the C4 report is not part of the MSATS procedure changes, AEMO will be referring this suggestion to the project technical workstream. It should be noted, however, that the project technical workstream is currently considering the addition of the NTC to the output of the C7 report which the MPB can run once they are nominated on a change request. There seems to be no benefit in the MPB getting a C4 report at REQ stage as they will get a C4 at COM stage (assuming they are nominated on the change request), and they cannot update MSATS until the change request completes i.e. they become the current active MPB.</p>
				2.3(p) the LNSP should only be responsible for updating certain participant codes which are incorrect. They are not responsible for updating participant types, such as MC, MP, MDP.	AEMO believes that clause 2.3 (p) is correct as the LNSP can still correct roles before the change request completes.
95.	United Energy	2.2	Financially Responsible Market Participant	(2.2) (o) UE note that currently for a New Connection it is the FRMP that determines the Initial ADL value, and passes it to the LNSP (and MDP) as part of the New connection service order. UE recommends adding additional text to clause (o) that makes it clear that for a New Connection the FRMP is responsible for determining and supplying the initial ADL value to the MDP.	AEMO agrees to add the obligation for providing the ADL to the LNSP and MDP for new connections to the FRMP obligations and removing it from the LNSP obligations, section 2.3(e) will be deleted.
96.	United Energy	2.3	Local Network Service Provider	<p>Under 2.3 (e) - UE doesn't see any logic behind the requirement the LNSP must supply the MP with the ADL at the time of NMI creation</p> <p>Currently, for a New Connection, the initial ADL value originates with the Retailer (Not the LNSP), and is passed as a mandatory field to the LNSP in the New Connection Service Order. It is the retailer that has the necessary customer information to generate the initial ADL value not the LNSP.</p> <p>UE Suggest the 'at the time of creation of a NMI' is removed from this statement and the current wording is retained as part of the CR400x, CR250x transactions, which is adequate:</p> <ul style="list-style-type: none"> CR400x - (d) Obtain the ADL from the LNSP if this value is not otherwise provided by the New FRMP. CR250x – (e) Provide the ADL if this value is not otherwise provided by the New FRMP. 	
97.	Endeavour Energy	2.3	Local Network Service Provider	We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback.	

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				We understand that the first part of clause 2.3.e is an existing obligation. However in context of the new metering competition arrangement this obligation is redundant. When the retailer wants a new NMI created they will need to raise a B2B NMI Allocation Service Order which contains the ADL as a mandatory field. We believe that given the retailer will be engaging the MDP via a MC, the retailer should provide the ADL directly. It is inefficient and inappropriate to make the LNSP, who is not a party to the commercial agreement between the retailer and MC and MDP, to be a messenger of information that the LNSP does not own. In a similar manner the New MDP can obtain the existing ADL from MSATS from the FRMP via NMI Discovery Search 2. We suggest that the obligation in clause 2.3.e be deleted.	
98.	TasNetworks			TasNetworks believe the full application of this section is now onerous for mass market customers. Specifically (e) - <i>LNSP to provide ADL to MDP "on creation of NMI"</i> This was an automated process for mass market Type 6 customers as LNSP was the MDP. Now that MC is a separate participant, how is this to be achieved in high volume ? TasNetworks suggest this be removed as an obligation moving forward or modified to allow DNSP to publish a set of default ADL's for each tariff configuration.	
99.	Endeavour Energy	2.4	Metering Data Provider	Procedural improvement: Following on from our feedback on clause 2.3.e, the current MDP should obtain the ADL from the retailer, or determine the ADL themselves given that they are the Current MDP. Due to the new metering competition arrangement we suggest that clause 2.4.m be reworded to: "Obtain the ADL from the FRMP or determine the ADL from <i>metering data</i> and enter the value into MSATS."	
100.	Endeavour Energy	21.4	MDP Requirements	Procedural improvement: Clause 21.4.d suggests that the LNSP be the default party to obtain the ADL. Following from our feedback on clause 2.3.e, we believe that the MDP should obtain the ADL from the New FRMP via NMI Discovery Search 2. We would suggest that clause 21.4.d we reword to: "Determine the ADL from the metering data or obtain it from the New FRMP."	
101.	Endeavour Energy	2.3	Local Network Service Provider	Procedural improvement: Clause 2.3.n is a duplicate of clause 7.13.2 of the NER. Consistent with AEMO's principle to not duplicate NER obligations this clause should be deleted.	Sections 2.3(n) & 2.3(o) contain MSATS specific information, hence it is not an exact duplicate of the rules and will be retained
102.				Procedural improvement: Clause 2.3.o is a duplicate of clause 7.13.3 of the NER. Consistent with AEMO's principle to not duplicate NER obligations this clause should be deleted.	
103.				Procedural improvement: Clause 2.3.p places an obligation on the LNSP to correct any incorrectly assigned Participants after the NMI was created. However MSATS does not permit the LNSP to perform the correction, instead only the FRMP or MC can do this under the new metering competition arrangement. We believe placing an obligation on the LNSP to perform an action when the system does not allow them to do is inappropriate. We note that the FRMP already have a similar obligation under clause 2.2.n but the MC does not have a similar obligation. We suggest that clause 2.3.p be deleted and a new clause be created for the Current MC that is the same obligation as clause 2.2.n.	AEMO believes that section 2.3(p) is correct as the LNSP can still correct roles before the change request completes.
104.	Ergon	2.3	Local Network Service Provider	For clarity Ergon Energy recommends the wording in 2.3(m) is changed to: "Provide Network Tariff Codes and descriptions to AEMO for the initial population of the Network Tariff Code in MSATS so that the appropriate tariff can be applied at the Register ID level."	AEMO believes that section 2.3(m) should not be changed as suggested as the obligation is on the LNSP to populate and ensure the Network Tariff Code is correct and not on AEMO. AEMO only maintains and administers the allowable list of Network Tariff Codes in MSATS.
105.	Endeavour Energy	2.4	Metering Data Provider	Procedural improvement: Clause 2.4.p should take into consideration clause 7.8.9.b of the NER which allows for type 5 and 6 meters to be read remotely. Also the note under table 4-13 should be included in this clause for completeness. To avoid confusion we suggest that clause 2.4.p be reworded to: "For <i>metering installations</i> that are manually read update the Next Scheduled Read Date in MSATS within two <i>business days</i> of a <i>meter</i> being read. There is no requirement to maintain the Next Scheduled Read Date for meters that are read daily"	Agreed, but will be drafted differently.
106.	Active Stream	2.4	Metering Data Provider	(c) The paragraph needs to be clearer what must happen with Interval Datastream status when the de-energised is done remotely or physically. As per 1 st stage reponse, Active Stream's position is that Datastream should be made 'inactive' where the site has been physically de-energised and 'active' for remotely de-energised site. The statement of "The proposed Change Date must be the day after the connection point is de-energised" can lead to misunderstanding. The statement has been used in LNSP obligation at section 2.3.J. For example: LNSP updates NMI status to D with Propose Change Date = 01.07.2016, which means De-energisation happens on 30.06.2016. But because of the statement above, some MDP's may potentially think that the proposed date to inactivate interval datastream is 02.07.2016). In this case, the statement must be clear such as "the proposed change date must align with the date when NMI Status become De-energised (updated by LNSP)"	It is ultimately up to the MDP to decide what should happen with datastream status. Some MDPs prefer to leave accumulation datastreams active and provide zero consumption.

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				(e) similar to above comment. The statement must be clear such as “The proposed change date must align with the date when NMI status become re-energised (Updated by LNSP)”.	
107.	AusNet Services	2.4	Metering Data Provider	Regarding 2.4(b) why has the word “metering been” removed from here? Regarding 2.4(g) should this be SLP?	2.4(b) - The defined term is ‘Historical Data’ 2.4(g) - Agreed
108.	AGL	2.4(q)		This clause should also be applicable to VICAMI meters.	VICAMI is managed by the LNSP and does not involve contestable metering, hence it shouldn’t be included in this section.
109.	AGL	2.5	Metering Provider – Category B	clause (d) the obligations should be extended to relevant registered participants and the ENM, as well as the LNSP. Many of these parties will not have commercial arrangements with the MPB, but should still be entitled to the information.	ENM is included in this section as per table 4-B “LNSP is the Local Network Service Provider or Embedded Network Manager for child connection points”. With regards to other Registered Participants AEMO recommends the participant to refer to the NER for rules related to Access to Data.
110.	Ergon	2.5 & 2.6	Metering Provider – Category B & MC	The procedure is not clear as to which party is responsible for the impacts of any error which may occur in relation to population of the Network Tariff Code. Ergon Energy recommends that the procedure stipulate that the party responsible for the error should be required to rectify, and if necessary, provide billing rectification to the retailer and / or customer.	AEMO considers that there are sufficient incentives for Market Participants to manage the update of this field correctly, and to have arrangements for rectification of any errors, and does not consider this to be a matter for the procedures.
111.	ActewAGL	2.6	MC	Header should be 2.6 Metering Coordinator	Agreed
112.	Red Lumo			Typographical amendment: For consistency, the heading should not be an acronym, i.e. this should be Meter Coordinator	
113.	AusNet Services	2.6	MC	Regarding 2.6(a) AusNet Services believes providing the name of the MDP to the FRMP could be contractual. If it is an obligation in these procedures then providing the MPB and MPC roles to them should be as well.	AEMO believes section 2.6(a) is correct as per NER clause 7.3.2(d)
114.	AusNet Services	2.6	MC	Regarding 2.6(b) we consider an MPC is traditionally linked with a MDP not the MPB as they are the collector of meter data. Appointing a MP as per (b) only talks about the provision, installation and maintenance of meters not about the collection of data. Suggest you have the following 3 clauses. Appoint MDP Appoint MPB Appoint MPC	Agreed, the reference to MPB and MPC will be removed.
115.	Endeavour Energy			Procedural improvement: The reference to MPC in clause 2.6.b should be moved to 2.6.a because the MPC is a category of MDP and not MP.	
116.	Endeavour Energy	2.6	MC	We submitted comments in the initial consultation and have noted AEMO’s response of ‘AEMO needs to understand why there is a compelling case for this to occur’ and wish to provide further feedback. The MC appoints the MP and MDP and should be responsible for ensuring that they communicate and work with each other. When there is any inconsistency in information between the MP and MDP we believe that the MC needs to ensure that the MP and MDP investigate and fix accordingly. Having the MC as the single point of contact for any data discrepancies would provide for a more efficient process instead of contacting the MP and MDP individually because it would not be clear from the data discrepancies which party has the correct data. Procedural improvement: There should be a new obligation on the MC to ensure that the standing data used by the MP and MDP are correct and consistent. For example the Meter Serial ID populated in MSATS by the MP must be the same Meter Serial ID populated in the NEM12. We suggest a new clause 2.6.k as ‘Ensure that the values for data fields defined in the NMI Standing Data Schedule is correct and used consistently when updating MSATS and in all communication including MDFF, MDM, B2B and notification of metering work.’	The structure that is being proposed by Endeavour Energy is already well considered within the NER and procedures under the NER; specifically MPs and MDPs are required to ensure that standing data and metering data are accurate and the MC is charged with the appointment of providers which includes the responsibility to ensure that they are operating in accordance with the rules. Accordingly AEMO does not consider an obligation needs to be added as proposed.
117.	Energy Australia		MC	References to RP Role Throughout the CATS procedure there is reference to ‘RP’ Role, particularly in tables (I understand that this is because the MC Role will still be titled RP in MSATS but it actually means Metering Coordinator). I do think there is benefit in updating MSATS to reflect the MC role as something more meaningful in MSATS (i.e. MC and not RP). A change like this will assist participants (existing and new ones) in understanding the procedures purely because the codes can be more explicit and reflects the language and roles the market will begin to use.	Whilst the competition in metering rule change removes the role of ‘responsible person’ and creates the new role of MC, the role ID of ‘RP’ in MSATS would come at a cost for both AEMO and industry and AEMO cannot identify any reasonable cause for making such a change. Consequently, the term ‘MC’ will be used in a procedural context and ‘RP’ when referring to the Role ID.
118.	Origin	2.7	RETAILER OF LAST RESORT	As the ROLR for a ROLR Event is determined and appointed by a Regulator, the ROLR Role in MSATS is for indicative purposes only.	The ROLR role in MSATS is no longer used in the ROLR process, in a recent ROLR event in Victoria, the ESCV advised AEMO who the ROLR is and the ROLR in MSATS was not used.

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				<p># Is this effectively saying then there should be no validations regarding having the ROLR role correct in MSATS – this seems to be correct where there is a failed retailer event but not where it is applicable to an obligation to supply the site with an offer</p> <p>Our view is that there are two reasons for the ROLR role in MSATS and the lack of validation of this being correct maybe problematic.</p> <p>ROLR Event – within the AER jurisdictions that ROLR role in SMATS is only indicative during a failed retailer ROLR event as the AQER will determine where customers will be transferred – however in VIC it is still required as the ROLR role will be the destination of the customer as the AER process isn't in place.</p> <p>Secondly the ROLR role is also indicative of which retailer has a requirement to make an offer to the customer if no other retailer is willing to make them an offer – so it could imply an obligation on the participant named in the role to make an offer. Therefore it wouldn't be indicative it would create an obligation.</p>	With regards to the second scenario, it refers to the default retailer which is different to the ROLR.
119.	ActewAGL	2.10	Embedded Network Manager	(p) fix to standardise “N” to 'N' (Off Market Child NMI)...	Agreed
120.	Ausgrid	2.10	Embedded Network Manager	<p>Ausgrid requests that AEMO use defined 'logic' to allocate the NMI ranges/sets referred to in clause 2.10 (a) such that the LNSP hosting the embedded network is readily identifiable from the NMI. For example, embedded networks in the Ausgrid area are currently allocated from the 4104xxxxxx range. The first four characters of the NMI should be reflective of the Jurisdiction and Network to which the parent NMI is connected.</p> <p>Many systems have logic using the first 2/4 characters of the NMI to validate jurisdictional codes and requirements.</p>	This issue is not an MSATS procedure issue, however we will be passing it to the project technical workstream for consideration.
121.	AusNet Services	2.10	Embedded Network Manager	<p>Embedded Network Rule Change</p> <p>Re 2.10(q) AusNet Services believes the timeframe of 5 business days should be added here</p>	Agreed
122.	Endeavour Energy	2.10	Embedded Network Manager	<p>Embedded Network Rule Change</p> <p>Procedural improvement: The last sentence in clause 2.10.e should be a listed as a separate clause because it is not directly related to first sentence.</p>	Agreed
123.	Energy Australia	2.10	Embedded Network Manager	<p>Embedded Network Rule Change</p> <p>How is 'consent from a retailer' captured as mandatory information?</p> <p>If this statement is to ensure that the ENM has a process and method of capturing the EIC this should be spelled out, currently it reads as though the consent can be captured as mandatory information.</p>	AEMO believes section 2.10(b) is correct as the consent is mandatory and a pre-requisite for the NMI creation, and this obligation is consistent with a similar LNSP obligation.
124.	ActewAGL	3.1	Overview	(j), (k), (l) ...sections 0. References gone missing	Agreed
125.	AusNet Services			j), k) & l) have incorrect references	
126.	Endeavour Energy			Procedural improvement: The references listed at the end of clause 3.1.j, 3.1.k and 3.1.l are incorrect. We suggest that this be corrected.	
127.	Momentum			<p>(k) The next most significant transaction is the NMI Discovery Search. This transaction will be used by a Participant when undertaking a search of the CATS Standing Data, as specified in section chapter 0.</p> <p>All through the document, the reference to “Section 0” has been made however it's not clear as to what section it is referring to, and the hyperlink is also broken.</p>	
128.	Pacific Hydro	3.1	Overview	<p>Suggest the Following:</p> <p>A Change Request is Completed the day after the Objection Logging Period has ended, no Objections exist and an Actual Change Date has been provided by the MDP. Where an Objection has been received the Change request is Completed the day after all Objections have been withdrawn and there is an Actual Change Date provided by the MDP. The change is effective from the Actual Change Date.</p>	Agreed in concept, however will be drafted differently.
129.	Ergon	3.1	Overview	<p>Ergon Energy recommends the below change to reflect correct terminology.</p> <p>3.1(i)</p> <p>A Change Request carries with it a set of CATS Standing Data items. The set of data items will vary with the transaction selected by the Participant initiating the Change Request. Each reason <u>transaction</u> has a code (Change Reason Code), as detailed in section 4.2 and Table 4-A.</p>	Agreed
130.		3.2	Principles	Ergon Energy recommends the below change as it more accurately reflects the requirement.	Agreed

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				3.2 (i) Jurisdictions will specify rules to control who is allowed to object to a Change Request, the reason for the objection and the NMI Classification Code to be assigned <u>appropriate</u> to that Objection.										
131.	Active Stream	3.4	Change Requests	Table 3-2. “Provide Data” section: Remove CR6801 as this is no longer required as per section 38.6	Agreed									
132.	Endeavour Energy	3.4	Change Requests	Procedural improvement: The reference listed at the end of clause 3.4.j is incorrect. We suggest that this be corrected.	Agreed									
133.	Ergon	3.4	Change Requests	Ergon Energy recommends the below change as it more accurately reflects the requirement, that names and roles of organisations are not provided, but rather a Participant Code is provided – which includes names and roles. 3.4 (b) Information about an End User’s connection point include the names and Roles of organisations <i>(Participant Codes)</i> that provide a connection point service to the End User, the technical details associated with the End User’s metering installation and specific information that would assist retailers in providing competitive offers to End Users.	Agreed									
134.	Endeavour Energy	3.5	Change Request Status Life Cycle	Procedural improvement: The diagram in clause 3.5 is blurry. We suggest that a clearer diagram be inserted.	Agreed									
135.	ActewAGL	3.5	Change Request Status Life Cycle	(b), (c) ...section 0. References gone missing Reword to read better (k) When a Change Request is Cancelled, notifications are sent to the relevant Participants in accordance with the Change Request Status Notification Rules. The Cancelled status occurs where: (i) Not all Objections have been withdrawn at expiry of the Objection Clearing Period; or (ii) The initiator of the Change Request has withdrawn the transaction.	The current wording is clear and follows the structure of the previous paragraphs.									
136.	Active Stream	3.7	Valid Proposed Change Date For Prospective And Retrospective Change Requests	3.7.1(a) change to “the date the Change request is raised...”	Agreed									
137.	AusNet Services	3.7	Valid Proposed Change Date For Prospective And Retrospective Change Requests	Regarding 3.7.2(a) we suggest making this consistent and have it at the end of the section same as 3.7.1	Agreed									
138.	ActewAGL	4.2	Change Reason Code	Table 4-1 Why are there blank lines in the table? Unless to provide a break, remove all blanks.	There seems to be no blank lines in that table									
139.	Aurora	4.2	Change Reason Code	In the table 4A of Change Reason Codes the 6800 indicates it is for Small and 6801 is for Large, however a 6800 and 6801 is for both Large and Small and the transaction number indicated prospective or retrospective.	Agreed									
140.	Origin			<table><tr><td>6800</td><td>Change Multiple Roles SMALL</td><td>Current FRMP or Current MC</td></tr><tr><td>6801</td><td>Change Multiple Roles LARGE</td><td>Current FRMP or Current MC</td></tr></table> <p>The Change Reason Codes descriptions need to be updated to match the descriptions in Section 38.1 as below</p> <p>38.1. Application [6800 6801]</p> <p>Section 36 applies to the following Change Reason Codes:</p> <table><tr><th>Change Reason Code</th><th>Comment</th></tr><tr><td>6800 – Change Multiple Roles</td><td>Used where the Current FRMP or Current MC is required to provide concurrent Prospective Changes to one or more Roles.</td></tr><tr><td>6801 – Change Multiple Roles – Retrospective</td><td>Used where the Current FRMP or Current MC is required to provide concurrent Retrospective Changes to one or more Roles.</td></tr></table>		6800	Change Multiple Roles SMALL	Current FRMP or Current MC	6801	Change Multiple Roles LARGE	Current FRMP or Current MC	Change Reason Code	Comment	6800 – Change Multiple Roles
6800	Change Multiple Roles SMALL	Current FRMP or Current MC												
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Change Reason Code	Comment													
6800 – Change Multiple Roles	Used where the Current FRMP or Current MC is required to provide concurrent Prospective Changes to one or more Roles.													
6801 – Change Multiple Roles – Retrospective	Used where the Current FRMP or Current MC is required to provide concurrent Retrospective Changes to one or more Roles.													
141.	United Energy	4.2	Change Reason Code	Point A – Role Change UE has concerns that the Initiating Participants may not be correct for some of the transactions listed in Table 4.1	Refer to section 4.3 in the POC Procedures Final Report and Determination									

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				<p>The initiating participant for CR6xxx Role Change transactions appear to be inconsistent, as noted below.</p> <p>Notwithstanding a lack of clarity over the proposed process and sequence of Change Requests for managing meter churn, it appears as though the initiation participants for some transactions may not be consistent with the rules as noted below.</p> <ul style="list-style-type: none"> CR62xx (Change MDP) can be initiated by both the FRMP and MC. This is not consistent with the rules –which allow only the MC to appoint the MDP. CR63xx (Change MC) is initiated by the MC only. However the rules state that the FRMP appoints the Metering Coordinator. Why is the FRMP not the Initiating participant here?? 68XX – This transaction which allows the change of multiple roles can be initiated by either the FRMP or the MC – and so is inherently not strictly aligned with the rules. <p>There may very well be advantages in allowing these transactions to be more flexible than the strict interpretation of the rules allow – UE recommend that AEMO clarify the use of these transactions where they are not consistent with the rules.</p>	
142.		32.1	Application [6200 6210]	<p>Point A – Role Change Initiation Rules:</p> <p>(32.1) The initiating roles for CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2.</p>	
143.		33.4	Application [6300 6301]	(33.1) The initiating roles for some CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2.	
144.		34.1	Application [6300 6301]	(34.1) The initiating roles for some CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2.	
145.		37.1	Application [6700 6701]	(37.1) The initiating roles for some CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2.	
146.		38.1	Application [6800 6801]	(38.1) The initiating roles for some CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2.	
147.	AGL	4.3	Role Codes	No consistency in application of who can initiate various CRs	
148.	Active Stream	32	Change Role – Change MDP – SMALL or LARGE	Are we getting rid of 62xx and 67xx? Not required since LNSP as MC will be given access to 68xx	
149.		37.	Change Role – Change MPB or MPC or both – SMALL OR LARGE	Are we removing this CR?	
150.	AusNet Services	4.4	Change Request Initiation Rules	Regarding 4.4(a) we note “and roles status that are” has been removed, we believe this should remain as its describing what the initiating rules specify and these rules validate on the roles and their status (whether they're current or new).	We have amended these paragraphs to capture the issue. Note that this is also addressed in section 4.3 of the Glossary and Framework.
151.		4.8	Objection Rules	Regarding 4.8(a) AusNet Services notes ‘and roles status’ has been removed, we believe this should remain as its describing what the objection rules specify and these rules validate on the roles and their status (whether they're current or new)	
152.	Ergon	4.5	Jurisdiction Codes	Ergon Energy notes that in 2015 we worked with AEMO to create a jurisdiction code for our isolated networks; so as to enable the use of MSATS for our non-grid connected customers. Ergon Energy acknowledges this code may not need to appear in this procedure, although we wish to highlight that we seek for this code to continue to apply.	<p>The ISO Jurisdiction code does not need to be specified in the MSATS procedure as it is used to support non-NEM sites. As such, it is not within AEMO's jurisdiction to prescribe binding obligations in the MSATS Procedures.</p> <p>The ISO code will continue to exist in MSATS to facilitate Ergon's use of the system to manage its non-NEM connections. .</p>
153.	Ausgrid	4.7	Objection Codes	Ausgrid note the AEMO Determination to allow the 'BADMETER' objection code to be retained.	Noted
154.	Vector			Vector AMS support the reinstatement of the BADMETER objection code to ensure alignment between the Read Type Code and the status of the metering installation.	
155.	Endeavour Energy	4.7	Objection Codes	Procedural improvement: We do not agree that the MDP at a Greenfield NMI can object to the LNSP updating the NMI status to 'A' before the MP has created the metering installation. This implies that the MDP can hold up the activation of the NMI until the MDP has set up their systems regardless of the physical status of the connection point. We believe that if the LNSP receives reliable information that the connection point is energised then the LNSP should be able to change the NMI Status to 'A' and not be held up due to the MDP not having their systems ready.	Agreed

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				We suggest deleting the last sentence in the description of the BADMETER objection code.	
156.	Pacific Hydro	4.7	Objection Codes	BADPARTY – MP is not a role in MSATS. Suggest this be replaced with MPB and MPC. DEBT – suggest the previous wording provided as Jurisdictions’ objection for debt guidelines are not just a monetary limit.	Agreed AEMO does not believe the retention of the original description for DEBT is required as it is not add any benefit or meaning to the context of the objection code within MSATS procedure.
157.	Active Stream	4.10	End User Classification	4.10.2.b Inconsistency using NMI status code ‘R’. This paragraph still refers to NMI status Code ‘R’ while in Table 4-8, NMI status R has been removed. Suggest removing ‘R’	Agreed
158.	AGL			NMI Status code ‘R’ has been removed form cl 4.11, but still shown in cl 4.10	
159.	AusNet Services			Regarding 4.10.1(b) why has this been changed? It now seems to suggest that a NMI is not a connection point. previous wording was: “at a single connection point to which the NMI information applies.” this wording is now saying: “at a NMI and not the connection point”. Regarding 4.10.2 b) should R be removed from here as it's now a meter status?	
160.	Endeavour Energy			Procedural improvement: Clause 4.10.2.b should not include the NMI Status of ‘R’ due to AEMO’s decision to no longer make the LNSP use a ‘R’ status. We suggest that the reference to ‘R’ be removed in this clause.	
161.	Active Stream	4.11	Status Codes (NMI and Datastream)	4.11.3.b The meter register codes listed is not consistent with Table 4-10. 4.11.3.c. and 4.11.3.d This sections describe Datastream attributes. Therefore these sections should be moved to section 4.11.2	Agreed
162.				Change to Datastream suffix to 4.11.3.c.(iii) and d(iii) instead of just ‘suffix’	
163.	Endeavour Energy	4.11	Status Codes (NMI and Datastream)	Procedural improvement: Clause 4.11 includes obligations on the status code for the meter and register. We suggest that the heading for clause 4.11 be updated to: “Status Codes (NMI, Datastream, Meter and Register)”	Less is more. We have deleted the text in brackets. The sub-headings are clear enough.
164.	AGL	4.11		Reference in leading sentence missing Code D – alternatively refer all codes to table.	Agreed, however the suggested descriptions will be drafted differently.
165.	AGL, AusNet Services, Endeavour Energy, Momentum, Origin, Red Lumo, Energy Australia	4.11.3	Status Codes (NMI and Datastream)	Clause indicates that Meter Register Codes are only C & R, however, code D has been introduced.	
166.	AusNet Services	4.11		Table 4.10 this description of current needs to change to say. Applies when a meter at the NMI is current and connected.	
167.	Momentum			4.11.1. NMI Status Codes (a) The NMI Status Code is used to determine if a <i>NMI</i> can be used for a retail transfer. (b) The NMI Status Codes are A, D, G, R, N and X and are defined in Table 4-8. Repeated “are”, please delete.	
168.	Red Lumo			In relation to the Name of code for D suggestion is that this is ‘Disconnected Remotely’ rather than ‘Remotely Disconnected’ – as this will avoid confusion between R and D.	
169.	Endeavour Energy			Procedural improvement: The description of the code C in table 4-10 should be updated to highlight the difference with code D. We suggest rewording to: “Applies when a meter at the NMI is installed and not <i>remotely disconnected</i> .”	
170.	Aurora	4.11	Status Codes (NMI and Datastream)	During the POC-PWG meeting (7 July) site identifiers for remote Disconnection & Reconnection were discussed. During the discussion it was advised if a single meter is remotely Disconnected (where there	Meter Register Status Code “R” is already used to indicate when a meter at the NMI is removed, and it can not also be used for remote disconnection at the meter level.

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				are 2 or more meters) a D flag will be held on the meter level and not on the NMI level. Aurora Energy would like to request the identifier in this instance is R and not D as this is consistent with the NMI Identifier of R for a remote Disconnection.	
171.	Endeavour Energy	4.11	Status Codes (NMI and Datastream)	<p>Procedural improvement: Clause 4.11.3.c is confusion because it allows for a DataStream Type of 'P' for sample meters, but the lead-in sentence does not mention the Metering Installation Type Codes of SAMPLE.</p> <p>We suggest removing references to 'P' in clause 4.11.3.c.i, and inserting a new sub-clause of 4.11.3.e as follow:</p> <p>If the MeterInstallCode is SAMPLE:</p> <p>(i) DataStreamType must be P</p> <p>(ii) ProfileName must be NOPROF</p> <p>(iii) Suffix must be Nx (e.g. N1)</p>	<p>AEMO does not believe the suggested change is possible as part of this rule change as the majority of the SAMPLE meter sites have COMMSx and datastream type of P as the metering installation code.</p> <p>AEMO recommends that the participant raises this issue through the usual change request process for future discussion and consideration.</p>
172.	United Energy	4.11	Status Codes (NMI and Datastream)	4.11.3 (c)) Please refer to MSATS CATS Procedure Feedback for Section 4.12 Below with regards to the proposed VICAMI code definition in this procedure.	Noted
173.	Jemena	4.11	Status Codes (NMI and Datastream)	<p>Remote disconnection/ reconnection update on meter level</p> <p>Jemena considers the proposed remote disconnection/ reconnection status in MSATS may potentially lead to the below issues:</p> <p>a) Timing issue</p> <p>AEMO does not think it necessary to specify timeframes for the FRMP obligation to notify the LNSP of remote disconnection and remote reconnection as the NERR provide sufficient guidance on the timeframes for those notifications. It is noteworthy the NERR does not apply in Victoria as it does not fully implemented NECF. Lack of clarity on the process and timeframes might lead to higher instances of 'wasted vehicle visit' fees charged to FRMPs and potentially increase the number of disputes.</p>	Refer to section 4.2 in the POC Procedures Final Report and Determination
174.	TASNetwork			<p><u>MSATS Procedures: Disconnection & Reconnection – Site Identifier</u></p> <p>TasNetworks supports</p> <ul style="list-style-type: none"> - Moving the status of the meter contactor to meter level. - Achieving the new state by adding a new enumeration <p>Updating of this to become an MP responsibility</p>	
175.	Origin			<p>The ability to identify a site which has been remotely disconnected or physically disconnected will be critical to ensure the correct process is followed to connect a customer.</p> <p>The separation of the NMI Status from the Meter Status to differentiate the disconnection method is the preferred approach.</p> <p>However there are additional consequences which need to be considered during this approach and cannot be agreed in isolation.</p> <p>1 – Network billing. Networks currently stop passing on NUOS charges to a retailer when a site is disconnected and the NMI Status is updated to D. If this proposed process means that the meters will be remotely disconnected and the NMI stays as Active then there needs to be a clear agreement to understand in what circumstances network charges will continue to be incurred by the retail business.</p> <p>2 – Where there are multiple meters at a site there may be an issue where all the meters cannot be remotely disconnected. NMI Discovery needs to be able to easily identify if all meters at a site have been remotely disconnected or if any are still connected.</p>	
176.	Pacific Hydro			<p>As per the meeting on 7 July 2016 the new value of 'D' for remote disconnection will be added to the existing Meter Register Status field at the meter level. The existing 'D' NMI status will remain and refer to the physical de-energisation of the site. Whilst this is generally agreed there are issues concerning how the two fields will operate. What is the connection between NMI Status and the Meter Register Status? If there are three meters at the site and only two can be remotely de-energised what happens to the NMI status? This also raises issues relating to network billing which will need to be addressed. If network billing is driven by the NMI status and it remains 'A', Active, even though all or some of the meters associated with the NMI have been remotely de-energised, how will this be managed?</p>	
177.	Vector			<p>Vector AMS supports the remote disconnect "D" code on the Meter Register Status, and having this code maintained by the MP, as opposed to the previous proposal to have the "R" code on the NMI Status maintained by the LNSP.</p> <p>This makes it very clear to industry participants the energisation status of the site; and allows the party responsible for the different ways of energising and de-energising the site, also responsible for maintaining the state in MSATS.</p>	

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				<p>This also does not preclude an additional near real-time ability to remotely energise, de-energise and query the current energisation state via the Shared Market Protocol/B2B.</p>													
178.	AGL			<p>Re-En / De-En Status</p> <p>AEMO has proposed that disconnection status be shown at the NMI level and de-energisation meter status at the meter level.</p> <p>Clarity about how a site has been de-energised (or a meter de-energised) is important for an incoming party to understand what action must be taken to re-energise a site.</p> <p>At a NMI level the possible options for de-energisation are:</p> <table><tr><th>De-energisation Type</th><th>Actioning Party</th></tr><tr><td>F (fuse removed)</td><td>LNSP / ENO</td></tr><tr><td>S (sticker)</td><td>LNSP / ENO</td></tr><tr><td>R (remote)</td><td>LNSP / ENO</td></tr><tr><td>P (pole-top or pillar)</td><td>LNSP / ENO</td></tr><tr><td>T (technical e.g. meter load tails)</td><td>LNSP/ENO/ MP</td></tr></table> <p>The proposed types do not cover these options and as this will be critical for providing efficient customer service, AGL believes that further work in this area is required.</p>	De-energisation Type	Actioning Party	F (fuse removed)	LNSP / ENO	S (sticker)	LNSP / ENO	R (remote)	LNSP / ENO	P (pole-top or pillar)	LNSP / ENO	T (technical e.g. meter load tails)	LNSP/ENO/ MP	
De-energisation Type	Actioning Party																
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P (pole-top or pillar)	LNSP / ENO																
T (technical e.g. meter load tails)	LNSP/ENO/ MP																
179.	AGL	26.1	Application [5050 5051]	<p>AGL supports a proposal below that additional fields be included in NMI standing Data and which can be driven by the CR 5050 /CR5051 transaction by the actioning party–</p> <p>Field Name: De-energisation Status</p> <p>Requirement: Mandatory if the NMI Status Code field is “D” and invalid for all other codes.</p> <p>Modifiable By: LNSP or MPB – whoever undertakes the work.</p> <p>Description: This field will allow all market participants to easily identify the method used to de-energise a site and will assist participants in providing clear and correct advice to a customer around the method, timeframes and charges to re-energise a site.</p> <p>Field Name: De-energisation Date</p> <p>Requirement: Mandatory if the NMI Status Code is “D” and invalid for all other codes.</p> <p>Modifiable By: LNSP or MPB – whoever undertakes the work.</p> <p>Description: This field will allow participants, particularly prospective FRMPs, to see how long a site has been de-energised when arranging a re-energisation. This will allow pro-active requests for safety certificates where a site has been disconnected for over 12 months. (Requirement in Victoria)</p> <p>The proposed fields could be:</p> <ul style="list-style-type: none">F (fuse removed)S (sticker)R (remote)P (pole-top or pillar) <p>T (technical e.g. meter load tails)</p>													
180.	Red Lumo			<p>NMI Status Update Obligation</p> <p>AEMO will remove the new NMI status of “R” and will insert a new Meter Register Status of “D” at the Meter level where the responsibility will be on the MP to update for remote disconnections and remote reconnections.</p> <p>Remote Disconnection Status at Meter Level</p> <p>AEMO will add a Meter Register Status of “D” at the meter level for remote disconnection.</p> <p>In relation to the above conclusion from AEMO’s Draft Report and Determination, Red/Lumo Energy has an alternative suggestion.</p> <p>The proposal is for two new fields within NMI Standing Data:</p> <p>Field Name: De-energisation Status</p> <p>Requirement: Mandatory if the NMI Status Code field is “D” and invalid for all other codes.</p>													

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				<p>Modifiable By: LNSP or MPB – whoever undertakes the work.</p> <p>Description: This field will allow all market participants to easily identify the method used to de-energise a site and will assist participants in providing clear and correct advice to a customer around the method, timeframes and charges to re-energise a site.</p> <p>Field Name: De-energisation Date</p> <p>Requirement: Mandatory if the NMI Status Code is “D”, invalid for all other codes.</p> <p>Modifiable By: LNSP or MPB – whoever undertakes the work.</p> <p>Description: This field will allow participants, particularly prospective FRMPs, to see how long a site has been de-energised when arranging a re-energisation. This will allow pro-active requests for safety certificates where a site has been disconnected for over 12 months. (Requirement in Victoria)</p> <div><div><div>Obtain Standing Data - Results</div><div><div>Participant ID:VEPL</div><div>Participant Name:Lumo Energy Australia Pty Ltd</div></div><div><div>Go to:View Data StreamsView Participant RelationshipsView Meter Registers</div><div><div>General Information:</div><div><div>NMI:<div></div></div><div><div>Classification Code:SMALL</div><div>Jurisdiction:VIC</div></div><div><div>Embedded Network ID (Parent):</div><div>Aggregate Flag:</div></div><div><div>Embedded Network ID (Child):</div><div>TNI Code:VRT7</div></div><div><div>Start Date:</div><div>DLF Code:ELVE</div></div><div><div>NMI Status Code:D</div><div>End Date:</div></div><div><div>De-energisation Status:R</div><div>Updated On:</div></div><div><div></div><div>De-energisation Date:01/07/2016</div></div></div><div><div>Address Information:</div><div><div>Building/Property Name:</div><div>Location Descriptor:</div></div><div><div>Lot Number:</div><div></div></div><div><div>Flat/Unit</div><div>Type:<div></div> Number:<div></div></div></div><div><div>Floor/Level</div><div>Type:<div></div> Number:<div></div></div></div><div><div>Street</div><div><div>House Number:<div></div></div><div>Name:<div></div></div><div>Type:<div></div></div><div><div>House Number Suffix:</div><div>Name Suffix:</div></div></div><div><div>Suburb/Locality:</div><div>State:<div></div></div><div>Postcode:<div></div></div></div><div><div>DPID:</div><div></div></div></div></div></div><p>The below table provides the proposed new fields and usage dependent on the NMI Status Code field:</p><table><tr><th>NMI Status Code</th><th>De-energisation Status</th><th>De-energisation Date</th></tr><tr><td>G</td><td>N/A</td><td>N/A</td></tr><tr><td>A</td><td>N/A</td><td>N/A</td></tr><tr><td>D</td><td>Mandatory: F (fuse removed) S (sticker) R (remote) P (pole-top or pillar) T (technical e.g. meter load tails)</td><td>Mandatory</td></tr><tr><td>X</td><td>N/A</td><td>N/A</td></tr></table><p>The responsibility for updating these fields via a CR 5050/5051 would be the participant who completed the work, whether it be the LNSP or MPB.</p><p>This proposal benefits Retailers when undertaking a NMI Discovery to ascertain the type of re-energisation required, Distributors and Meter Providers can use of one change request to update the relevant fields. We consider this recommendation an efficient solution, and would be happy to discuss with AEMO should further suggestions or clarification be required.</p></div></div></div>	NMI Status Code	De-energisation Status	De-energisation Date	G	N/A	N/A	A	N/A	N/A	D	Mandatory: F (fuse removed) S (sticker) R (remote) P (pole-top or pillar) T (technical e.g. meter load tails)	Mandatory	X	N/A	N/A	
NMI Status Code	De-energisation Status	De-energisation Date																		
G	N/A	N/A																		
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D	Mandatory: F (fuse removed) S (sticker) R (remote) P (pole-top or pillar) T (technical e.g. meter load tails)	Mandatory																		
X	N/A	N/A																		
181.	Pacific Hydro			<p>There is a need for the type of de-energisation used at the site to be available in MSATS through NMI discovery as this will determine how the retailer re-energises the site. The responsibility for updating the fields, De-en Type and De-en Date could be added to the 5050/5051 and the De-en type could be a</p>																

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				single alpha to identify the type of de-en e.g. R= Remote, F= Fuse Removed etc. The roles responsible for updating the fields would be either the LNSP or MDP.	
182.	Active Stream	4.12	Metering Installation Type Codes	Table 4.12 – What's the purpose of Manually Read Flag column? COMMS meters are remotely read meter. Therefore, the column should have value “N”.	Section 4.12 has been clarified to indicate that Manually Read Flag is used to request an Actual Change Date, and it not related to whether the meters are manually or remotely read.
183.	Ausgrid	4.12	Metering Installation Type Codes	Ausgrid note the AEMO Determination on Meter Installation Type. The 'note' in Table 4-12 is not relevant for COMMS4. Minimum specification meters are being installed prior to the 1st Dec 2017. It is expected these meters will have their Meter Installation Type updated to COMMS4D or COMMS4C when the new Codes become available. Ausgrid propose the note should read :- “Note: This code is used for any customers with type 4 metering installations that are not capable of providing the minimum services.”	Having the dates in the definition allows parties to retain existing metering codes, and it does not prevent them from changing the codes in the future if they choose to do so.
184.	AGL	4.12	Metering Installation Type Codes	Remove VICAMI type code and revert to type 5	The MSATS procedures do not mandate that VICAMI Meters should be updated in MSATS with the new Metering Installation Type Code “VICAMI”, AEMO considers that having a facility to clearly identify VICAMI Meters in MSATS is reasonable. But it is up to the participants to determine whether to adopt this code or another code that complies with the NER.
185.	CitiPower & PowerCor			AEMO has attempted to provide the Victorian Distributors with the ability to leave Vic AMI Meters as AMI Type 5 (as they are under the Chapter 9C Derogation) and therefore avoid the need for IT system changes and accreditations to achieve type 4 Validation/substitution rules etc. However the creation of the “VICAMI” Metering Installation Code will still require the Victorian Distributors and Retailers to undertake a massive migration of the 2.8 Million existing regulated AMI Meters across to this new Metering Installation Type Code on market start. There will need to be some arrangement and time provided for that work load to be undertaken, over the top of the introduction of the rules and market start on 1 December 2017 and this requirement for the Victorian Meters could possibly be delayed?	
186.	Pacific Hydro			VICAMI meters are currently identified in the market as MRIM with a Read Type Code of RWD. Instead of changing to a VICAMI Metering Installation Type, VICAMI meters could be 'grandfathered' under the existing definition as at 1 December 2017. Any subsequent removal of a VICAMI meter would be installed as COMMS4C, COMMS4D or MRAM. This would reduce the amount of change and pre-cutover effort for impacted participants.	
187.	Vector			Not sure what value there is in reassigning Vic AMI meters to VICAMI when existing systems are in place across the market to detect Vic AMI meters based on Metering Installation type Code = MRIM, and Read Type Code = RWD (remotely read). Why not stay with that as a grandfathering arrangement to avoid rework and unnecessary changes to participant systems? With the scope of changes coming through, it is in all of industry's best interest to minimise unnecessary changes.	
188.	United Energy			UE has articulated its overall view regarding the VICAMI install type code in our introduction general comment (G2). The Victorian AMI Industry Steering Committee comprising of Victorian Government, AEMO, retailers, distributors, regulators and consumer representatives collectively agreed to type 5, MRIM, RWD flag. UE consider that this meter classification and identification of a Vic AMI meter should continue, there is no benefit for consumers in changing the meter classification and metrology. Any change in this area will impose additional cost, risk and complexity in a programme that is already running well behind in terms if an achievable delivery schedule. In short UE believe that there should be no “VICAMI”, references in the documentation.	
189.				G3 - If AEMO require the VICAMI flag to capture all meters churned to Vic AMI meters from 2009? As noted above UE recommends that the DB Vic AMI meters be retained under the current type 5 arrangements given that there is no compelling case to change. However, if AEMO reject this view and require identification of VICAMI meters in the market, then all Vic AMI meters for consumers below 160MWhpa should be identified as such. Both distributors and retailers as a licence condition, must undertake meter exchanges with a Victorian AMI meter that meet the functionality, performance and service levels of Victorian minimum specification advanced meters. Until the Victorian Government repeal these instruments this continues as a licence obligation for Victorian retailers and distributors for meter exchanges in Vic even after 1 Dec 2017. AEMO should have a clear position on what the Vic AMI flag is trying to capture as this will impact the definitions, this should be clearly justified against the NEO. Refer to the Glossary, Chapter 3, comments below for more explanation on the two definitions. Before costs are incurred across all of industry which will be the outcome from the AEMO decision on 1 September 2016, AEMO should seek a written submission from the Vic Government on their position on the continued use of a Vic AMI meter specification, the need for reclassification of Vic AMI meters to	

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				VICAMI and the scope for reclassification.	
190.	Jemena			<p>VICAMI Metering Installation Type Code</p> <p>AEMO considers that an update of VICAMI NMIs from the currently used metering installation type codes to the proposed VICAMI code is unnecessary and does not add any value. For Jemena & other participants this will require system changes.</p> <p>The Victorian distributors have rollout approximately 2.8 million type 5 AMI meters. The industry collectively agreed to use MRIM and RWG metering codes for these type 5 AMI meters. We believe this well established meter classification and identification of a Victorian AMI meter in MSATS should continue as there is not benefit for customers or market participants in changing the meter classification from RWD to VICAMI. There should be no VICAMI references in the procedures—instead RWD should take the place of the proposed VICAMI code in the draft procedures.</p> <p>It is worth noting there is no rule in the NER that requires an existing meter established in the market systems or participant systems to be reclassified to a new classification. Should AEMO require this change, it will impose cost to market participants including LNSP, FRMP and AEMO for no benefit. Moreover, given the complex procedure changes the industry is required to deliver to very tight deadlines by 1 Dec 2017, we consider this change is of no benefit and significantly risks market participants not meeting other important procedure changes by the target date.</p> <p>Based on the discussions in the AEMO PoC working group, there appears be no support by distributors or retailers to rename the Victorian AMI meters from RWG to VICAMI. It is noteworthy, meters installed in the NEM are deemed to comply with the rules subsequent to a rule change until such time the meter is replaced. We believe that this same grandfathering practice should apply to Victorian AMI meters.</p>	
191.	Energy Australia	4.12	Metering Installation Type Codes	<p>In the table 4-12, VICAMI code references 'Clause 9.9C of the NER'. This clause from the NER expires in December 2017.</p> <p>Given 9.9C expires when this procedure takes effect, EA questions whether this appropriate to include in the CATS procedure.</p>	AEMO considers it is appropriate to include this clause as it is part of the NER, and at the point where it is removed from new versions of the NER, interested parties can refer to the clause in previous versions of the NER.
192.	TasNetworks	4.12	Metering Installation Type Codes	<p>TasNetworks believes the proposed codes are inconsistent and create training and understanding issues.</p> <p>The proposed codes inconsistently include the following attributes;</p> <ul style="list-style-type: none"> - Existence of communications - Existence of CT/VT (Metering transformers) <p>The inconsistency is that where there are comms, we delineate between existence of CT/VT or not – ie 4C / 4D</p> <p>However where there is no comms we do not delineate between existence of CT/VT.</p> <p>Prospective Retailer should equally be interested in the existence of CT/VT on all 4A meters.</p> <p>TasNetworks propose using 4A/4B instead of MRAM</p>	AEMO does not see the need for further levels of differentiation such as a variation to the Type 4A code to include the reason that the Type 4A rather than Type 4 was installed, or distinguishing a Current Transformer or Whole Current for type 4A. AEMO considers this to be adding a level of complexity to a field that is unwarranted, when there are other ways to identify why a type 4A metering installation is installed. A type 4A metering installation is considered in the NER to be installed in exceptional circumstances and the MC will have to ensure that it manages any exemptions allowing the installation of type 4A, and therefore must keep records outside of MSATS. Further, the NER does not provide for a type 4 metering installation to be replaced with a type 4A.
193.	Vector			<p>MRAMD (COMMS4AD?) and MRAMC (COMMS4AC?) will be required. If there is a need to distinguish WC and CT for Type 4 then the same requirement would apply to Type 4A.</p> <p>AEMO need to consider Type 4A as a transient state where Type 4 installations could move in and out of Type 4A over the life of the metering installation based on customer preference and/or communications coverage.</p>	
194.	Active Stream			<p>Type 4 and 4A</p> <p>Active Stream believe that the process is yet to be adequately determined as to classifying and notifying relevant industry participants where Type 4 meters change to Type 4a meters and vice versa.</p> <p>Reasons for the change from 4 to 4a need to be made available as part of NMI discovery e.g. communications issues, customer refusal etc. to avoid future customer or compliance issues where an MC churns and is not aware of a customer refusal. More work on the process therefore needs to be undertaken by AEMO to clarify.</p>	
195.	AGL			<p>Metering Installation Identification</p> <p>AEMO notes that the MC is required to maintain records outside MSATS for the installation of Type 4A meters. Customers can opt out – either to the FRMP or the MC as described in the NER.</p> <p>The customer Churn rules enable an MC to churn at the same time as the retail churn, provided the meter is not churned, which means that it is quite possible that at some time in the future – a new FRMP or MC may churn the meter to a type 4 against the customer wishes.</p> <p>It is not acceptable that critical information of this nature is not recorded globally (i.e. NMI discovery stage), as this will have a large impact on possible contracts which may be available to the customer and likely lead to substantial customer complaints.</p>	

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196.				Insufficient work has been done on establishing the process for meters moving from type 4 to 4A and back again. The combination of customer refusal as well as sustained or intermittent communications issues may require meters to change back and forth. Consistent and clear processes for this are necessary to make these transitions smooth and seamless.	
197.	Momentum			<u>Meter type 4A</u> Momentum raised it previously and would like to raise it again - Meter type 4A needs to have some information in MSATS (background data to advise if it is 4A because of <u>customer prevention</u> or <u>comms issue</u>) as a standing data, so this can be discoverable by NMI discovery process. We argue that this data is not customer data, because it is linked as a part of meter history. Inclusion of this information will assist us in identifying any meter replacement issues and we will strongly recommend this to be included at a Meter Level in MSATS.	
198.	Energy Australia			<u>Metering Installation Identification</u> AEMO notes that the MC is required to maintain records outside MSATS for the installation of Type 4A meters. Customers can opt out – either to the FRMP or the MC as described in the NER. The customer Churn rules enable an MC to churn at the same time as the retail churn, provided the meter is not churned, which means that it is quite possible that at some time in the future – a new FRMP or MC may churn the meter to a type 4 against the customer wishes. It is not acceptable that something so critical is not recorded globally such that it becomes part of NMI discovery, as this will have a large impact on possible contracts which may be available to the customer and likely lead to substantial customer complaints. Information like this will be crucial in developing procedures regarding reversion of 4A to 4 (and vice a versa).	
199.	Ausgrid	4.13	Read Type Code	Ausgrid agree with the updated Read Type Codes in section 4.13.	Noted
200.	AusNet Services	4.13	Read Type Code	Table 4.13 Believe RR and SP should apply to all meter types (also see comments on Table 4.14)	AEMO notes that the Table of Read Type Codes in MSATS is used to guide participants to the valid combinations of Read Type Codes, Metering Installation Type Codes, and Change requests. AEMO does not consider that Read Type Codes 'RR' and 'SP' should be added to all meter types as those codes are not applicable for remote read meter installation types and UMCP. The VICAMI metering installation type code is used for remote read meters, where RR and SP do not apply.
201.	AusNet Services			Table 4.14 As per AEMO's feedback from my comment this table should be updated. AEMO: AEMO clarifies that there are no rules in MSATS controlling the use of the Read Type Code, and that the Read Type Code is an instruction from the requesting FRMP to the MDP, nominated in the Change Request to assist the transfer by using the specified reading method. This table will then need to be updated. If you were to build rules (objection) around this table and most participants do then this table states you can't use RR or SP for VICAMI or COMMSx. 4.14 a) Incorrect reference table	
202.	Active Stream	4.13	Read Type Code	Read Type Codes As Jurisdictional requirements have not yet been finalised (and Active Stream understands that these are being worked through by AEMO), it is considered necessary that these remain until the Jurisdictional requirements are met.	AEMO does not believe that the removed Read Type Codes of 'NI' and 'NB' should be retained as read type codes are not compatible with the Jurisdictional rules.
203.	AGL			Read Type Codes AGL notes the comments regarding various read type codes, but as the Jurisdictional requirements have not yet been finalised, AGL suggests that these codes not be removed until the Jurisdictional requirements are met.	
204.	AusNet Services	4.13	Read Type Code	General Comment (3) The changing of Meter Read Type to Read Type Code in the create/maintain meter CR's is incorrect and should remain as Meter Read Type, this is the field name in MSATS and is not the same as the code referred to in table 4.13	Agreed
205.	United Energy	4.13	Read Type Code	There appears to be inconsistency in the use of Customer, Consumer and End User throughout this procedure e.g. Table 4-13 refers to Consumer Read and End User Read, Table 4-14 replaces End User read with Consumer Read (Assume this is a defined field value which is why it states 'Consumer'?). Some inconsistency also appears throughout the document. Suggest a find/replace on Customer and alignment of terms across document. If these terms are intended to have different meanings it would be useful to define them in the Glossary.	Please note that there are more than 100 references to 'consumer' and another 100 to 'customer' in the pre-consultation draft that we have tried to rationalise. We have tried to not change the headings/codes as many refer to data fields in MSATS, but we have tried to avoid the term 'customer' as there are new terms <i>small customer</i> and <i>large customer</i> in the NER. The use of the term 'consumer' didn't seem to fit as well as End User.

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206.	AGL	4.16	Maintenance of Codes and Rules	Number on meter faceplate should be put into MSATS. There can be discrepancies between MP asset numbers and manufacturer’s numbers. For clarity – the number on the face plate of the meter (often a manufacturer ID) should also be loaded, as this is sometimes the only number visible on an installed meter.	AEMO recommends that any interested party considers raising this matter through the regular request for change process, as AEMO cannot identify any compelling or suffiicient reasons for including this change as part of the Metering Competition, Embedded Network, and MRP Rule change.																		
207.	AGL	4.16	Maintenance of Codes and Rules	Table of data The Controlled Load Table has been introduced, but the information is not provided for in any NMI Standing Data schedule.	Based on participant feedback the proposed change which was introduced as a result of submissions to the initlal stage of consultation was considered a low priority with many participants considering it as a ‘nice to have’, or having limited value at this stage. As a result, AEMO will not be proceeding with this change and recommends that any interested party raises this change through the regular request for change process.																		
208.	CitiPower & Powercor, SAPN			CP/PAL & SAPN do not support the inclusion of “Time of Day Codes” and “Controlled Load Indicator” within the codes that AEMO must maintain. Although the concept appears sound, this change is not driven by NER changes for Metering Contestability and not critical for 1 December. It should be considered by Industry at a later stage when a full assessment of the impact to AEMO and Participant systems has been completed and a full Cost Benefit completed.																			
209.	Endeavour Energy			Formatting error: The words ‘Controlled Load Indicator’ in clause 4.16.a is written in white text and hard to read. We suggest that this text be in black like the other text in the table.																			
210.	Endeavour Energy			Procedural improvement: We support the inclusion of the Time of Day Codes and the Controlled Load Indicator as codes that AEMO will maintain. At the AEMO workshop on 7 July 2016 there was a suggestion that this change is a nice to have and is not mandatory for 1 December 2017. We believe that making these fields AEMO maintained codes from 1 December 2017 is necessary to ensure the market operates more smoothly when metering competition starts. It should be noted that currently the network is the LNSP and MP for a large volume of NMIs but this will change and there would be more reliance on defined data when communicating between market participants. Due to the closure of the Solar Bonus Scheme on 31 December 2016 there is an increase of interval meters installed in NSW over the last few months and the data that we are receiving shows that there is benefit in having defined data values. We do not expect the change to have a significant cost to implement given that the fields are already mandatory and that MSATS already have the functionality to have maintain and validate against a list of codes for a particular field. However we see great benefit as it will allow participants to automate the setup of systems for receiving and loading the metering data.																			
211.	Origin			<div><div><div>4.16. Maintenance of Codes and Rules</div><div>(a) AEMO must maintain the following codes and rules in MSATS:</div><table><tr><td>Change Reason Codes</td><td>Role Codes</td><td>Initiation Rules</td></tr><tr><td>Jurisdiction Codes</td><td>Timeframe Rules</td><td>Objection Codes</td></tr><tr><td>Objection Rules</td><td>NMI Classification Codes</td><td>NMI Status Codes</td></tr><tr><td>Metering Installation Type Codes</td><td>Read Type Codes</td><td>Field Validation Rules</td></tr><tr><td>Change Request Status Notification Rules</td><td>NMI Discovery Search – NMI Search Rules</td><td>NMI Discovery Search – NMI Data Access Rules</td></tr><tr><td>NMI & CATS Standing Data Access Rules</td><td>Network Tariff Code</td><td>Time of Day Codes</td></tr><tr><td></td><td></td><td></td></tr></table></div><div>The Controlled Load Indicator is in the table in white text and almost impossible to see.</div></div>		Change Reason Codes	Role Codes	Initiation Rules	Jurisdiction Codes	Timeframe Rules	Objection Codes	Objection Rules	NMI Classification Codes	NMI Status Codes	Metering Installation Type Codes	Read Type Codes	Field Validation Rules	Change Request Status Notification Rules	NMI Discovery Search – NMI Search Rules	NMI Discovery Search – NMI Data Access Rules	NMI & CATS Standing Data Access Rules	Network Tariff Code	Time of Day Codes
Change Reason Codes	Role Codes	Initiation Rules																					
Jurisdiction Codes	Timeframe Rules	Objection Codes																					
Objection Rules	NMI Classification Codes	NMI Status Codes																					
Metering Installation Type Codes	Read Type Codes	Field Validation Rules																					
Change Request Status Notification Rules	NMI Discovery Search – NMI Search Rules	NMI Discovery Search – NMI Data Access Rules																					
NMI & CATS Standing Data Access Rules	Network Tariff Code	Time of Day Codes																					
212.	Pacific Hydro			Inclusion of Controlled Load Indicator and Time of Day in the table. Is this change PoC related? If not, what is the rationale for making this change at this time? Suggest this be deferred to another implementation if not PoC related.	We have deleted the references to time of day and controlled load indicator in the table.																		
213.	TASNetwork			<u>MSATS Procedures: AEMO Administered Fields</u> TasNetworks do not support these changes because; - They are not related to MC nor Embedded Networks - There has been no cost benefit analysis performed It will create higher costs for the industry																			

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ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE														
214.	Endeavour Energy	3.6	Transaction Validation	Procedural improvement: We note that AEMO has agreed to include Controlled Load and Time Of Day as administered fields in MSATS. Consistent with AEMO’s decision we suggest that Controlled Load and Time Of Day be added to 3.6.a.i for completeness.															
215.	Ausgrid	4.16	Maintenance of Codes and Rules	<p>Ausgrid propose the re-purposing of the ‘Controlled Load’ indicator as a ‘Load Type’ indicator. The controlled load indicator was defined for the market before generation loads existed. The market needs to future proof the reference data that will be used to populate and validate Network Tariffs. Considering AEMO’s determination to make the populating of the network tariff code a mandatory requirement on the MPB, additional and consistent information is required in order to substantiate the network tariff code.</p> <p>Ausgrid propose:</p> <ul style="list-style-type: none">Field of ‘LoadType’ replaces ‘ControlledLoad’;The ‘Load Type’ field will be mandatory for all kWh registers;<ul style="list-style-type: none">The values populated in the ‘LoadType’ field will be defined by each LNSP;The values populated in the ‘Load Type’ field will be administered by AEMO;The ‘Time of Day’ field will be mandatory for all kWh registers;<ul style="list-style-type: none">The values populated in the ‘Time of Day’ field will be defined by each LNSP;The values populated in the ‘Time of Day’ field will be administered by AEMO;Suggested Matrix:- <table><tr><th>Load Type</th><th>Time of Day</th></tr><tr><td>General</td><td>All Hours</td></tr><tr><td rowspan="3">Controlled</td><td>OP1</td></tr><tr><td>OP2</td></tr><tr><td>OP3</td></tr><tr><td rowspan="5">Generation</td><td>Net Solar</td></tr><tr><td>Gross Solar</td></tr><tr><td>Battery</td></tr><tr><td>Wind</td></tr><tr><td>Gas</td></tr></table> <p>Examples:</p> <p>An E2 NMI Suffix with Controlled Load 2 would be defined as:- LOAD TYPE: CONTROLLED TOD: OP2</p> <p>A B2 NMI Suffix with Gross Solar Generation would be defined as:- LOAD TYPE: GENERATION TOD: GROSS SOLAR</p> <p>Ausgrid contends it is simply not acceptable for the LNSP to have to accept the network tariff code populated by the MP is correct and needs sufficient information to be able to validate the load characteristics of each datastream match the nominated NTC. The above proposal meets these requirements without imposing significant system changes.</p> <p>Furthermore, the market does not know the next evolution of generation products or tariffs. The referential data held in MSATS should cater for the future if we are consulting on change to existing Time of Day and Controlled Load values.</p>	Load Type	Time of Day	General	All Hours	Controlled	OP1	OP2	OP3	Generation	Net Solar	Gross Solar	Battery	Wind	Gas	AEMO recommends that any interested party raises this matter through the regular request for change process, as there are no compelling or sufficient reasons for including this change as part of the Metering Competition, Embedded Network, and MRP Rule change.
Load Type	Time of Day																		
General	All Hours																		
Controlled	OP1																		
	OP2																		
	OP3																		
Generation	Net Solar																		
	Gross Solar																		
	Battery																		
	Wind																		
	Gas																		
216.	AGL	4.17	Datastream Status Code	<p>Cl(b) (b) The Datastream Status Code makes use of the ‘active’ and ‘inactive’ codes specified in Table 4-I</p> <p>Remove examples ‘active’ and ‘inactive’</p>	Agreed														
217.	Ausgrid	4.17	Datastream Status Code	<p>Ausgrid proposes an update to the clause below.</p> <p>(d) If a Datastream Status Code is set to A (active) this flag will be used by MSATS to indicate that metering data is to be expected for the NMI for the purpose of:</p> <p>(i) Aggregation in the settlements process; or</p>	Agreed														


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				(ii) Netting off in the determination of a profile shape.	
218.	Energy Australia	4.18	Embedded Network Codes and Rules	Document No “MT_GN1710v0xx.doc – Allocation of Embedded Network Codes” is referenced. Is this document in scope of review as part of PoC?	The document will be reviewed as part of the POC scope of work
219.	Endeavour Energy	4.19	Obtaining Electronic Downloads of Configuration Rules	In the eight row replace ‘DLF Code’ with ‘Distribution Loss Factor Codes’	The DLF Code will be kept for consistency with the remainder of the document
220.	AGL	5	Request a Report	Section 5.1-5.11 have been removed, yet they give better context and definition than the information of the table.	The earlier sections 5.1-5.11 did not add much to the procedure except for verbosity. We have reviewed the table to ensure that it contains all the information a Participant needs to know about each transaction type. Other procedural content has been moved to other parts of the document. For example: <ul style="list-style-type: none"> The original section 5(f) is now in section 2.1(i) Most of the original section 5.7 is now in section 43.
221.	Ausgrid	5	Request a Report	Ausgrid request the following information be added to the C7 Report:- <ul style="list-style-type: none"> Network Tariff Code Meter Manufacturer Meter Model The AEMO determination has made the population of the Network Tariff Code mandatory for the MPB. Providing the ‘current’ Network Tariff Code in the C7 Report will allow the MPB to provide a ‘like for like’ tariff update without depending on information from other Market Participants. Meter Model and Meter Manufacturer information is required to allow the new MPB to identify services configurations (eg Single Phase, 3 Phase, etc) – This information should be hosted in MSATS and will prevent unnecessary transactions between the new MPB and the current MPB or FRMP or LNSP to obtain this information.	Noted, as the reports specifications are not part of the MSATS procedure, this suggestion will be referred to the project technical workstream.
222.	Red Lumo	5	Request a Report	This section would benefit with additional information as to the information contained within each report, how the report is obtained, who can request a report, the frequency of the report etc. If this information is available within another document/procedure it is to be included and referenced in this section.	AEMO does not believe the MSATS procedure is the right document to contain the reports specifications, however AEMO may consider including the reports specifications in a separate document.
223.	Ausgrid	General	Change Requests	<u>Tier 1 Only CRs</u> Ausgrid agrees with the abolishment of these Change Request codes.	Noted
224.	United Energy	7.1	Application [1000 1010 1020 1030 1040]	[7.1] Can AEMO please clarify whether the new FRMP is permitted to nominate the new MC (RP Role) or any other proposed roles (New MPB, MPC & MDP) in prospective CR1xxx transactions in the procedure, as this is currently unclear. For retrospective CRs it is not reasonable for the new FRMP to nominate a new MC, MPB, MPC and MDP as these role changes will not align with the actual change date of a meter, which is a requirement under metrology part A 11.3, and the Rules 7.8.9 (i.e. a prospective FRMP cannot replace a meter until after the market load has been transferred, and the MP and MDP roles changes must align with the meter exchange date). It would be beneficial for AEMO to clarify the possible variations in how a meter churn can be completed, and the relevant CATS transactions as per the old Meter Churn Procedure, as it is unclear from the CATS Procedure which scenarios are permitted and consistent with the Rules and Metrology Part A.	Refer to section 4.3 in the POC Procedures Final Report and Determination
225.	Ausgrid			<u>CR1000 Series - Nomination of Roles by FRMP</u> Ausgrid contends the new Rules specifically preclude the FRMP from nominating or appointing metering service providers and/or initiating meter churn. The reluctance to remove the nomination of the service provider roles from these change requests will force both the old and new service providers (MC, MDP and MPB) to validate these roles for every change request received and object as appropriate. Ausgrid believe the following will result from AEMO’s determination:- <ul style="list-style-type: none"> All businesses will be forced into changing input validation and objection rules in their systems. This could be achieved by MSATS making a single change to input validation. Number of Objections related to transfers will increase. Businesses will break the Churn Rules Can AEMO please inform industry how it will monitor compliance to the Churn Rules?	

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226.	Active Stream	7.4	FRMP Requirements	(j) can't new FRMP populate MDP as well? (k) Actual End Date may be populated for all retrospective change. Therefore it can apply to CR1010 and CR1040 if necessary.	7.4 (e) will be moved to the “may” section under 7.4 Actual End Date is not required for CR 1010 and 1040 as those are short term retrospective CRs, however CR1020 is a long term restrospective CR where Actual End Date needs to apply.
227.	Red Lumo			In relation the following clause should a similar statement of ‘or leave this to the New MC to complete’ as it is within clause (j) be included? (e) for Change Reason Codes 1000, 1020, 1030 and 1040, if the MDP is changing, provide the following additional information	
228.	AGL	7.4	FRMP Requirements	Clause (d): Given the section is about FRMP requirements shouldn't it reference the ‘New FRMP’ and not the ‘New Retailer’? Consistency of terms.	Agreed
229.	Red Lumo			For consistency, update Retailer to FRMP in the following clause: (d) submit a Change Request to initiate the transfer of the End User from which the New Retailer has obtained Explicit Informed Consent and provide the following information with the Change Request	
230.	United Energy	7.4	FRMP Requirements	[7.4] Suggest that ‘New RP’ is renamed to MC as sometimes the MC will not be changing with a Retailer transfer	The table is meant to show the MSATS role ID which is RP Whilst the competition in metering rule change removes the role of ‘responsible person’ and creates the new role of MC, the role ID of ‘RP’ in MSATS would come at a cost for both AEMO and industry and AEMO cannot identify any reasonable cause for making such a change. Consequently, the term ‘MC’ will be used in a procedural context and ‘RP’ when referring to the Role ID.
231.	Active Stream	7.5	MDP Requirements	(b) be more specific that CR1500 is required in order to Complete CR1000/1010/1030/1040	Where a CR1500 is required, the MDP will get a request to provide it (i.e. section 7.5(b)). CR1500 is not required for type 7 metering installation hence it is not appropriate to specify it on every CR.
232.	AGL	7.5	MDP Requirements	The only type of meters not requiring a meter reading are type 7. Is this clause meant to cover manually read meters ? Clause (h) (iv); Original comment by AGL: Why isn't remote type 5 included in the list? AEMO's response: AEMO clarifies that the definition of type 5 is not remote read meter. AGL Response - There are a substantial number of remotely read type 5 meters in the current Market, separate to VICAMI meters. How does AEMO's framework propose to incorporate the remote read comms meters in the current Type 5 categories post 1 Dec 2017, or is it assumed that a type 5 can never be remotely read ? If AEMOs intention is that the clause only applies to manual read meters (which would also include type 4A) then this needs to be defined. Otherwise reword accordingly. If we are contemplate remote read Type 5 meters : Many millions of meters do not require a Meter Reading but will not be validated according to the nominated installation type codes identified in the above mentioned clause. Does that mean we would have to identify for each instance an error according to the clause? Or not report on it?	Agreed, the clause has been reworded to provide more clarity
233.	Energy Australia			Please confirm whether this clause is meant to cover manually read meters Clause (h) (iv); (as the only type of meters not requiring a meter reading are type 7).	
234.	Red Lumo			Update the following clause to include Manual as highlighted: (h) Where the NMI Classification Code is SMALL (iv) if the Read Type Code does not require a manual Meter Reading, validate that the Metering Installation Type Code is identified as a type 1, type 2, type 3, type 4 or type 7 <i>metering installation</i> . If an error is identified, advise the New FRMP	

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235.	Momentum			<p> (iv) if the Read Type Code does not require a Meter Reading, validate that the Metering Installation Type Code is identified as a type 1, type 2, type 3, type 4 or type 7 metering installation. If an error is identified, advise the New FRMP.</p> <p>Not sure what this clause is trying to convey. This clause makes more sense for type 5 to 7 metering installations because type 1 to 4 wouldn't require a Meter Reading. Perhaps "manual Meter Readings" would be more appropriate instead of "Meter Readings".</p>	
236.	Active Stream	7.6	MC Requirements	Suggest 'Current MC', not 'New MC'	Agreed, however if the MC can be changed on this change request we can have a New MC, and that the New MC becomes the Current MC once the CR is completed. AEMO will be updating the section for more clarity.
237.		8.5	MC Requirements	Suggest 'Current MC', not 'New MC'	
238.		9.6	MC Requirements	Suggest 'Current MC', not 'New MC'	
239.	Energy Australia	8.4	FRMP Requirements	<p>Clause (d):</p> <p>Replace 'New Retailer' with 'New FRMP'</p>	Agreed
240.	Active Stream	8.4	FRMP Requirements	<p>(d) Remove MDP from table, the CR should be routed to the relevant MDP. Otherwise should be Current MDP</p> <p>(f) can't new FRMP populate MDP as well?</p>	Agreed, The New MDP under section 8.4(d) will be moved under the "may" section of 8.4
241.	United Energy			<p>[8.4] Suggest that the population of 'New MDP' is removed from (d) and included under the 'may' (f) point as the MDP may not be changing</p> <p>Extra clarification would help to make this clearer stating that the change date (prospective or retrospective) needs to align with either the date the metering installation was physically corrected (if required), the date the errored transfer occurred (if there was no meter change), or a prospective date in the future</p>	
242.	AGL	8.4	FRMP Requirements	<p>Wording of these clauses should be reviewed</p> <ol style="list-style-type: none"> This clause relates to change of retailer – is it a change of retailer or change of FRMP ? The market role is FRMP, which includes retailer and market customer. When reviewing the requirement to initiate a change of retailer, the initiation rule points to cl 8.4. In Cl 8.4 the sequence of actions seems disjointed (eg gain consent prior to NMI discovery etc.) which must be undertaken prior to the initiation of a Change Request. <p>Cl 8.4 is effectively the requirements which should be undertaken prior to initiating a change request and the information required for the change request.</p> <p>AGL queries the format / information in all these clauses and suggests that they could be broken into pre-initiation, and requirements to initiate, requirements on other parties receiving the request</p>	<p>Agreed, section 8.3 has been renamed from initiation rules to initiating roles.</p> <p>Regarding the formatting comment, we agree that the structure of these sections can be improved but it is too big a change to be made at this stage. We will consider alternative structures when we next open up this document for consultation.</p>
243.	Red Lumo	8.5	MDP requirements	<p>The MDP requirements for this section have been removed from the draft procedures for this consultation, whereas these requirements were in the proposed procedures for the initial consultation. AEMO to confirm if this is correct, i.e. there are no requirements for the MDP for these change reason codes. If there are requirements, these are to be reinstated.</p>	AEMO clarifies that the section 8.5 was deleted as the majority of this section related to situation where MDP provided the ACD and is not the case for these error correction CRs. However AEMO will add the section back with the minimum requirements for consistency with section 7.5.
244.	AGL			MDP Requirements have been fully removed. Can AEMO please provide an explanation as to why this material has been deleted	
245.	Ausgrid	8.7	Objection Rules	<p>New Objection Role: On account of the FRMP being able to nominate a change of MC in a CR1000/CR1010/CR1020/CR1030 and CR1040, the current MC <u>MUST</u> be able to object.</p> <p>There are at least two scenarios where this is required:-</p> <ul style="list-style-type: none"> Where a new retailer attempts to change the MC for an existing Type 5, 6 or 7 metering installation. The existing MC must be able to object on account of there being no arrangement for this relationship to occur; and Where a new retailer attempts to change the MC for an existing LARGE customer who has elected to nominate their own MC. <p>An MC participant must be able to protect their business and facilitate compliance to the Rules where the retailers change request would otherwise result in a breach.</p>	<p>AEMO does not believe that the Current MC needs to be able to object in the first scenario provided by Ausgrid, as the FRMP is the responsible party for appointing MCs in this scenario.</p> <p>However AEMO agrees that the Current MC should have the ability to object in the second scenario provided by Ausgrid and will be adding objection code CONTRACT to the transfer CRs and allow the Current MC to use it. CONTRACT objection code is used when a change of MC is proposed and the Current MC has previously been appointed in the Role of MC by a large End User.</p>
246.	Active Stream	9.4	FRMP Requirements	(j) see earlier comments re not changing MP on retail transfer, misleading regarding churn rules	Noted

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247.	Active Stream	9.5	MDP Requirements	(b) Is it on receipt of a data request, OR - On receipt of a data request, the CR status is PEND and meter is installed, whichever date is later. Also be precise that CR1500 required to complete the CRs.	On receipt of data request, provide Actual Change Date. However if there is no meter and meter reading required, providing Actual Change Date cannot happen until the meter is installed. The CR status irrelevant. Where a CR1500 is required, the MDP will get a request to provide it (i.e. clause 7.5 (b)). CR1500 is not required for type 7 metering installation hence it is not appropriate to specify it on every CR.
248.	AusNet Services	9.8	Objection Rules	Embedded Network Rule Change: Regarding Table 9.2 LNSP's should have the ability to object - this was the feedback we gave in 1st stage. AEMO advised that it was a transfer situation and the LNSP is not a field that is selected in the CR. As the current LNSP we should be able to object if the LNSP is still us and an ENM needs to be appointed. Question for AEMO, does this mean that all child NMI's are going to have ENM's allocated against them as part of transition? If not and we are still the LNSP in MSATS then we need the option of objecting as we would want the ENM to be updated prior to a transfer being raised.	As the LNSP role does not change through CR108x, and as CR108x is only used for transferring Child NMIs between retailers and can not be used to make a NMI a Child NMI, AEMO does not consider that there valid reasons to allow the LNSP to object to CR108x. However AEMO considers it is reasonable to allow the current ENM/LNSP to object to CR509x which is used to make a NMI a child NMI.
249.		9.9	Change Request Status Notification Rules	Embedded Network Rule Change: Regarding Table 9.3 if AEMO accepts that LNSPs should be able to object then the notification rules need to change as well. Notifications should be provided to LNSPs for all status changes.	
250.	United Energy	10	Provide Data – Provide Actual Change Date – SMALL OR LARGE	[10] As we have noted in our general comments (G9) Clarification would be helpful within this procedure, and the meter churn sections of Metrology Part A & SLP MP Services procedures to clearly articulate the possible sequencing variations of a meter churn, and their relationship to the MSATS CRs which are used to enact the change in MSATS. We believe the following should be considered as applicable uses for the CR1500 to support the churn process: <ul style="list-style-type: none"> CR1xxx Retailer transactions – as per current descriptions. CR6xxx Prospective Role Changes – to support the completion of meter churn on the actual change date. CR308x / CR309x Advanced Change of Metering Installation (which includes the Role Churn) - to support the completion of role changes and meter exchange on the same date. 	Refer to section 4.3 in the POC Procedures Final Report and Determination
251.		10.1	Application [1500]	[10.1] Our understanding of the CR1500 is that it is to be used to provide the actual role change date of the FRMP for retailer transfers as it states but also significantly the MP and MDP role change date in the case of meter churn, so that the Metrology Part A 11.3(c) is met. However the text does not make it clear that it is to be used for this purpose. Additional explanation is required to describe the scenarios this transaction is applicable to (e.g. meter churn as well as retailer transfer).	
252.		10.2	Conditions Precedent	[10.2] We note that The Conditions Precedent (do not reflect the use of this transaction as a Meter Churn role change. Since it is the MC that will have Initiated the related change request not the FRMP (b) Should be expanded to include FRMP and MC (as the CR6800 can be initiated by the MC).	
253.	Pacific Hydro	10.1	Application [1500]	Suggest the following: The MDP is required to provide MSATS with the Actual Change Date that specifies the date on which the requested change takes effect in MSATS.	Agreed, but drafted differently
254.	Active Stream	10.2	Conditions Precedent	Suggest that this document actually stipulated where a 1500 is required, what are the prerequisite's etc. These are conditions precedent.	AEMO clarifies that where a CR1500 is required, the MDP will get a request to provide it (i.e. clause 7.5 (b)). CR1500 is not required for type 7 metering installation hence it is not appropriate to specify it on every CR.
255.	AGL			It is not widely known in what instances this CR should be used. New entrants without intimate detailed prior experience in the field (including existing participants entering new roles) will miss the requirement unless it is called out and scenarios are provided.	
256.	Active Stream	10.4	MDP Requirements	Please list what CRs that require CR1500 so it is precisely written and not confusing when reading the document.	
257.	AGL	10.2	Conditions Precedent	The MC may also change the MP / MDP, not just the FRMP.	
258.	Red Lumo			The following clause should include the MC as this participant will also be able to initiate a Change Request.	Agreed

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				(b) The FRMP has Initiated a related Change Request requiring an Actual Change Date						
259.	Momentum			(b) The FRMP has Initiated a related Change Request requiring an Actual Change Date. MC can also initiate this CR for changing						
260.	Energy Australia			The MC may also change the MP / MDP, not just the FRMP.						
261.	United Energy	10.3	Initiation Roles	[10.3] We note that the Initiating role is the MDP whereas the MP is the meter installer, and query whether the MP should be the initiating role for a meter churn transaction	AEMO does not believe that the MP should be an initiating role and clarifies that the aim of the CR is that it confirms that the MDP can read the meter, and the date it is read.					
262.	AusNet Services	10.4	MDP Requirements	AusNet Services believes there should be a paragraph to cater for role changes that align with a meter change. eg the 6800/1 change request. suggested wording: Provide the Actual Change Date to MSATS within 2 days of being advised by the Metering Provider that a meter has been installed.	The aim of CR1500 is that it confirms that the MDP can read the meter, and the date it is read, hence the new wording is not required.					
263.	United Energy	10.4	MDP Requirements	[10.4] MDP needs to be supplied the Change Request ID for Role Change & Advanced Change of Metering Installation CR types as well to facilitate process.	The related Change Request ID comes with the request for Actual Change Date, and a participant can run C7 report to obtain metering information					
264.	Active Stream	10.5	Timeframe Rules	Statement could be a lot clearer. The impact is that, if the CR is not raised within these 20 days, a new retro CR1xxx or 6XXX has to be raised. Again, status at PEND and meter install dates are key Also, there is no “Table 9-A” in the document. Please update with correct reference.	CR status is irrelevant to the CR, and the meter read date is key not meter install date.					
265.	AGL	10.7	Change Request Status Notification Rules	Note table shows RP not MC Tables need to be updated	The tables are meant to show the MSATS role ID which is RP					
266.	Ausgrid	11.1	Application [2000 2001]	<u>CR2000 Series - Creating NMI without Roles</u> Ausgrid contends the new Rules specifically preclude the LNSP from nominating or appointing metering service providers and/or initiating meter churn. The reluctance to remove the nomination of the service provider roles from these change requests will force both the new service providers (MC, MDP and MPB) to have to validate these roles for every change request received. If the nomination of service provider roles is not removed from the NMI Creations CRs, the B2B procedures will need to be modified to make the nomination of ALL roles by the FRMP mandatory – Should this not be the case, and Create NMI requests are received without ALL roles nominated, the LNSPs will have no option but to reject those requests.	Refer to section 4.3 in the POC Procedures Final Report and Determination					
267.	Jemena	11.4	LNSP Obligations	LNSP publishing roles during NMI creation AEMO does not agree to allow LNSP to create NMIs in MSATS without adding all the other roles (i.e. FRMP, MP, and MDP). The NER have specified requirements for parties to appoint roles, and as such, no NMI should be created without the retailer being able to provide details on the appointment of the MC, etc. Based on AEMO position, it is not clear to Jemena who will responsible if the roles are populated incorrectly.						
268.	TASNetwork			TasNetworks supports maintaining the requirement that CR2000/2001 include all roles.						
269.	Origin			<table><tr><td>262.</td><td>Ausgrid</td><td>10.4</td><td>LNSP Obligations</td><td>LNSP must populate all Roles in NMI creation. B2B SO Allocate NMI must support this process. The FRMP raising an Allocate NMI must populate all Roles required or the NMI Creation process to MSATS must change to only require LNSP and FRMP with MC as optional.</td><td></td><td></td><td>Refer to section 4.7</td></tr></table> <p>The Allocate NMI process is triggered often well in advance of the need to connect the site. In some cases developers are required to request the NMI at the early stages to allow the network to assess the network configuration requirements for the development.</p> <p>Based on an Allocate NMI Service Order from a retailer the LNSP should be able to create a NMI and assign the FRMP and LNSP roles, but having to nominate the metering roles often 9 months ahead of the actual connection will create unnecessary rework. The metering roles should then become mandatory to be updated when the metering is installed, but having them assigned so far in advance is unnecessary and will lead to change requests having to be raised to update roles.</p> <p>The industry workshops notes from 15th 16th Feb prior to the consultation considered that this approach would be considered by AEMO and was well supported by participants– but now seems to have been rejected. Origin support the FRMP and LNSP roles being assigned when the NMI is created and the Metering roles being optional at this stage.</p>		262.	Ausgrid	10.4	LNSP Obligations	LNSP must populate all Roles in NMI creation. B2B SO Allocate NMI must support this process. The FRMP raising an Allocate NMI must populate all Roles required or the NMI Creation process to MSATS must change to only require LNSP and FRMP with MC as optional.
262.	Ausgrid	10.4	LNSP Obligations	LNSP must populate all Roles in NMI creation. B2B SO Allocate NMI must support this process. The FRMP raising an Allocate NMI must populate all Roles required or the NMI Creation process to MSATS must change to only require LNSP and FRMP with MC as optional.			Refer to section 4.7			

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270.	Energy Australia			This section should all be section 11. Furthermore, there are potentially some mandatory information under 11.4c that the LNSP will not be aware of upon being asked to raise this (i.e. MPB, RP,MDP etc) if the customer has approached the LNSP direct as per 5a of the NER.	
271.	AGL	11.5	MPB Requirements	The MPB will not always know what the Metering Installation Type Code.... Should not be a mandatory field	Creating a meter record requires a meter installation type code (it is a key data item). AEMO agrees that this cannot be done until the meter installation details are known, and will make the section clearer in that sense.
272.	Red Lumo			Suggest that a timeframe of within 1 business day is included in the following statement, currently there is no timeframe assigned. The New MPB must on receipt of the Change Request Status notification for the Completed status, provide the Metering Installation Type Code to MSATS using Change Reason Code 3000 or 3001.	
273.	Ergon			MRP: Where NMIs are created as part of a greenfield development, the MPB may not yet be aware of the meter type upon connection, and thus it cannot be provided to MSATS as required under this clause. As such, Ergon Energy recommends that the clause be amended to note that if the NMI status is A or D the meter type code should be provided, and that once the meter type code is known by the MPB, it must then be provided to MSATS.	
274.	United Energy			[11.5] The 2000 CR should allow for the possibility that the MPB is not aware of the metering installation type at the time of NMI creation as may occur in the case of a Greenfield NMI. Suggest this is updated so the MPB can initiate this once the new connection / meter installation is completed. E.g. 'MPB must initiate a CR300x to MSATS within 2 business days after <u>both</u> the receipt of the CR200x COM and completion of the metering installation'.	
275.	Momentum			40.5. <u>11.5.</u> MPB Requirements The New MPB must, on receipt of the Change Request Status notification for the Completed status, provide the Metering Installation Type Code to MSATS using Change Reason Code 3000 or 3001. This can't be a 'must' because an NMI can sit in 'G' status for months.	
276.	Ausgrid	12.1	Application [2020 2021]	Ausgrid contends these change requests are superfluous. Given the solution has adopted the re-purposing of the LNSP role to accommodate for the ENM, the corresponding LNSP change requests (CR2000/CR2001) should suffice providing the 'Child Name' can be populated. <ul style="list-style-type: none"> Given the ENM is assuming the LNSP role in MSATS, it is logical the two participants use the same suite of change requests. 	AEMO believes those CRs should be retained so that they can only be used for creating child NMIs. This will at least enforce that the child EN name is populated. Reporting could be used to pick up where ENMs have used the 2000 series. There are also specific validations that apply to CR202x and not the other Create NMI CRs (i.e. populating child name is mandatory for CR202x).
277.	United Energy	12.5	MPB Obligations	[12.5] See comments in relation to 11.5 above	Noted
278.	Ausgrid	13.1	Application [2500 2501]	<u>CR2000 Series - Create NMI, Meter and Datastream</u> Ausgrid contends the Rules and Procedures specifically identify the MPB and MDP as being responsible for populating the Metering and Datastream in MSATS (respectively) - The LNSP no longer has a role to perform this function and MSATS should not allow these to be created by the 2500 series of change requests.	AEMO believes those CRs should be retained. In the case where the LNSP has all information about metering installation and MDM datastream available to them through agreements with MPs/MDPs then they can use those CRs to create NMI with all the available details to them.
279.	AusNet Services	13.4	LNSP Requirements	Regarding 13.4(h) change from meter read type to read type code please refer comment 3 in General Comments	Agreed
280.	AusNet Services	14.1	Application [2520 2521]	consistency make this the same as the other sections	Agreed
281.	United Energy	14.1	Application [2520 2521]	(14.4) As per 13.4 above.	Noted
282.	AusNet Services	14.4	ENM Requirements	Embedded Network Rule Change: k) embedded network parent name this would not be required as a child NMI would not have the embedded network code in the parent embedded network code field.	AEMO believes that "embedded network parent name" can still be required in the cases where a Child NMI is a parent of another embedded network (noting we have had this scenario in the NEM). The child EN name, however, should not be the same as the parent EN name for the same NMI.
283.	Active Stream	16.4	MPB Obligations	Same as section 15.4	Noted
284.	United Energy	16.4	MPB Obligations	Feedback Point A:	Noted

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				(16.4) As per UE's general comment (G7) and as per the response to 15.4 above. Feedback Point B: (16.4) As per UE's general comment (G6) and as per the response to 15.4 above.	
285.	Active Stream	17.4	MPB Requirements	See section 15.4	Noted
286.	Ausgrid	17.4	MPB Obligations	Refer to comments on clause 16.4.	Noted
287.	United Energy	17.4	MPB Requirements	Feedback Point A: (17.4) As per UE's general comment (G7) and as per the response to 15.4 above. Feedback Point B: (17.4) As per UE's general comment (G6) and as per the response to 15.4 above.	Noted
288.	AusNet Services	18.1	Application [3080 3081]	General comment: These CRs will require an Actual Change Date to be provided from the new MDP to enable these to complete. Prior to the rule change all of these parties were one entity for this CR. this has now changed and the NER does not allow metering to be changed by the MP unless they have been nominated in a CR or already are the MP. This CR completes on its own using the proposed date today but can't in the future as the role changes need to align with the meter install date.	Refer to section 4.3 in the POC Procedures Final Report and Determination
289.		19.1	Application [3090 3091]	Incorrect reference General comment: these CR's will require an Actual Change Date to be provided from the new MDP to enable these to complete. Prior to the rule change all of these parties were one entity for this CR. this has now changed and the NER does not allow metering to be changed by the MP unless they have been nominated in a CR or already are the MP. This CR completes on its own using the proposed date today but can't in the future as the role changes need to align with the meter install date.	
290.	AGL	18.4	MC Requirements	AGL's original comment: Clause (g) If this is a prospective change for a meter, then a CR 1500 also needs to be raised and should be noted in this section. AEMO's response: AEMO does not agree with participant suggestion As CR1500 is not relevant in the context to this CR. AGL's clarification: CR 3080 is about MC providing prospective changes. The prospective date may not be met. Hence, a CR 1500 is required to provide the actual change date. With respect to the above clarification a CR1500 has context to the CR3080. CR3080. is not needed and should not be used. However, if it is used then then a CR1500 is also required.	
291.		19.4	MC Requirements	AGL's original comment: Clause (g) If this is a prospective change for a meter, then a CR 1500 also needs to be raised and should be noted in this section. AEMO's response: AEMO does not agree with participant suggestion As CR1500 is not relevant in the context to this CR. AGL's clarification: CR 3090 is about MC providing prospective changes. The prospective date may not be met. Hence, a CR 1500 is required to provide the actual change date. With respect to the above clarification a CR1500 has context to the CR3090.	
292.	TASNetwork	18.1			

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			Application [3080 3081]	TasNetworks note that CR3080 should be changed to allow its use for changing Meters from 4 to 4A and 4A to 4 without Remove/Create. We note the rules allow that customers moving into a Type 4 premise can request the comms disabled, thus 4A is not a short term issue but an ongoing one that requires supporting market processes and transactions.	AEMO does not believe CR3080 requires any changes to accommodate changing from 4 to 4A and vice versa. If the change involves a different meter serial, remove\create CRs will be required, otherwise metering installation details can be updated using CR 305x.
293.	Momentum			Momentum suggests that 3080 should also be utilised in changing a meter from a 4A to 4 (if required). However, would this need to be replaced as a new meter? We don't see the need to replace the meter because technically these are exactly the same meters. Can this conversion be achieved without meter replacement? There could be scenarios when transitioning from 4 to 4A or vice versa can happen however to minimise customer impacts, Momentum strongly recommends the use of Meter Reconfiguration instead of Meter Replacement, provided it's supported by the same MP.	
294.	United Energy	18	Maintain Metering - Advanced Change Metering Installation Details - SMALL OR LARGE	<p>Feedback Point A:</p> <p>(18) Can AEMO please clarify whether these [3080 and 3081] transactions can be utilised by an MC to enact a role & meter churn, as described in the SLP MP Services Procedure Section 4.4.</p> <p>UE believes that these transactions could be used as an alternative to the CR680x / CR300x transactions where the metering details are known.</p> <p>UE also believes that the retrospective change transactions will be required when dealing with failed meter scenarios to facilitate the restoration of supply to a customer i.e. LNSP and Initial MC contacts FRMP, FRMP nominates their MC who will complete the meter exchange works as soon as practicable and then complete the relevant MSATS transactions after the customer has had supply restored.</p> <p>Per our general comments (G9) It would be beneficial for AEMO to clarify the possible variations in how a meter churn can be completed as per the old Meter Churn Procedure, as it is unclear from the CATS Procedure which scenarios are permitted.</p> <p>Feedback Point B:</p> <p>UE believes that the use of the CR1500 transaction should be permitted to confirm the Actual Change date for a Prospective CR308x / CR309x.</p>	<p>The procedure has been drafted to facilitate various business models and arrangements between parties where it is reasonable to do so, rather than seeking to restrict the market to one method of operation or another. For example, if a FRMP and an MC have agreed that, for efficiency, the FRMP will nominate a new MP in a CR, MSATS can facilitate that arrangement; the requirement to ensure that the CR is compliant with the NER resides with the party raising the CR.</p> <p>AEMO considers the requirements and obligations for the management of meter churn to be clear in the NER, Participants are able to determine the most optimum process to manage meter churn in accordance with these obligations.</p> <p>Feedback Point B, Agreed. CR1500 will be added to CR3080 and CR3090</p>
295.		19	Maintain Metering - Advanced Exchange Of Metering - SMALL OR LARGE	<p>Feedback Point A:</p> <p>(19) Can AEMO please clarify whether these transactions can be utilised by an MC to enact a role & meter churn, as described in the SLP MP Services Procedure Section 4.4.</p> <p>UE believes that these transactions could be used as an alternative to the CR680x / CR300x transactions where the metering details are known.</p> <p>UE also believes that the retrospective change transactions will be required when dealing with failed meter scenarios to facilitate the restoration of supply to a customer i.e. LNSP and Initial MC contacts FRMP, FRMP nominates their MC who will complete the meter exchange works as soon as practicable and then complete the relevant MSATS transactions after the customer has had supply restored.</p> <p>It would be beneficial for AEMO to clarify the possible variations in how a meter churn can be completed as per the old Meter Churn Procedure, as it is unclear from the CATS Procedure which scenarios are permitted.</p> <p>Feedback Point B:</p> <p>UE believes that the use of the CR1500 transaction should be permitted to confirm the Actual Change date for a Prospective CR308x / CR309x.</p>	
296.	Ausgrid	18.4	MPB Requirements	Refer to comments on clause 16.4.	Noted
297.	United Energy	18.4	MC Requirements	<p>Feedback Point A:</p> <p>(18.4) As per UE's general comment (G7) and as per the response to 15.4 above.</p> <p>Feedback Point B:</p> <p>(18.4) As per UE's general comment (G6) and as per the response to 15.4 above.</p>	Noted
298.	Vector	19	Maintain Metering - Advanced Change Metering Installation Details - SMALL OR LARGE	See comments on 16 above.	Noted
299.	Ausgrid	18.1	Application [3080 3081]	<p><u>CR3000 Series</u></p> <p>Ausgrid note the AEMO determination is retaining the CR308x and CR309x change requests. Ausgrid therefore specifically request:</p> <ul style="list-style-type: none"> Remove the ability to update contracts (MDP, MPB, MC) via these transactions. 	AEMO recommends that any interested party raises this matter through the regular request for change process, as there are no compelling or sufficient reasons for including this change as part of the Metering Competition, Embedded Network, and MRP Rule change.

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				<ul style="list-style-type: none"> Change the Objection Period for these transactions from 1 to 0 days (no objection). <p>Participants objecting to CR30xx transactions will stop the core process of adding meters into MSATS. Objections did not occur in the past because RP, MDP, MPB businesses were linked. The MC has the 68xx transactions to update roles where required.</p>	
300.		19.1	Application [3090 3091]	<p><u>CR3000 Series</u></p> <p>Ausgrid note the AEMO determination is retaining the CR308x and CR309x change requests. Ausgrid therefore specifically request:</p> <ul style="list-style-type: none"> Remove the ability to update contracts (MDP, MPB, MC) via these transactions. Change the Objection Period for these transactions from 1 to 0 days (no objection). <p>Participants objecting to CR30xx transactions will stop the core process of adding meters into MSATS. Objections did not occur in the past because RP, MDP, MPB businesses were linked. The MC has the 68xx transactions to update roles where required.</p>	
301.	Ausgrid	19.4	MC Requirements	Refer to comments on clause 16.4.	Noted
302.	United Energy	19.4	MC Requirements	(19.4) As per UE's general comment (G7) and as per the response to 15.4 above.	Noted
303.	Red Lumo	20	Maintain Metering – Change Network Tariff Code – SMALL OR LARGE	Refer comments within 12. Other Issues Related to Consultation Subject Matter	Noted
304.	Vector	20	Maintain Metering - Advanced Exchange Of Metering - SMALL OR LARGE	See comments on 16 above.	Noted
305.	United Energy	22.4	MDP Requirements	(22.4) As per UE's general comment (G7) and as per the response to 15.4 above.	Noted
306.	United Energy	23.4	MDP Requirements	(23.4) As per UE's general comment (G7) and as per the response to 15.4 above.	Noted
307.	Active Stream	24.5	Timeframe Rules	<p>How can a retro NSRD be created? Is this in case something was missed? If so, then similar to below comment, limit should be 90/100 days.</p> <p>How can the prospective period only be 3 days? All other CRs, the prospective period dictates the latest the proposed date can be, which is the equivalent of the NSRD. Therefore, shouldn't this be 90 days or 100?</p>	AEMO clarifies that the prospective\retrospective relates to the proposed change date on the CR and not the NSRD. The NSRD is a data item against the meter.
308.	Ausgrid	24.7	Change Request Status Notification Rules	<p>Ausgrid note the AEMO determination comments regarding CR507x notifications to the LNSP, where the response reads, "AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF".</p> <p>Ausgrid believes this comment is incorrect. Previous market consultations have confirmed that MSATS is the database of record for the Next Scheduled Read Date and a note has been added to the field description in the MDFF Specification advising <i>"The NSRD provided in this file is accurate at the time the file is generated (noting this may be subject to change e.g. if route change etc.). MSATS is the database of record, therefore, should there be a discrepancy between the NSRD Date in this file, and MSATS shall prevail."</i></p> <p>All Market Participants should be entitled to receive the information via a notification. From an LNSP's perspective, this information is critical in aligning network billing to the reading periods of Type 4A meters.</p> <p>Ausgrid agree the industry has challenges providing Type 4A NSRD notifications without increasing market transactions significantly. AEMO may have other options available for consideration.</p> <p>CR507x (5073 and 5074) transactions could be created and used for populating the NSRD to MSATS for Type4A (MRAM) metering. Notifications could then be sent to all roles given the lower volumes of transactions expected.</p>	Refer to section 4.3 in the POC Procedures Final Report and Determination
309.				<p>CR507x must be sent to the current LNSP for the 'MRAM' (and any other non-regulated manually read meters if allowed under the Rules) Metering Installation Type. It is assumed that the market would want these sites Network Billed as per the NSRD. The LNSP therefore requires notification of the transaction. The LNSP does not require notifications for BASIC or MRIM Metering Installation Types.</p> <p>Also add LR to Notification – Resolves contention in MDFF.</p> <p>AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF</p>	

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				<p>Ausgrid disagrees with AEMO’s position on this matter. The NSRD provided in the MDFF is correct at the time of publishing the meter readings only and does not account for any changes to the NSRD subsequent to that date.</p> <p>Much effort was recently expended in modifying the MDFF specification to clarify the correct and current source of the NSRD. This was resolved by nominating MSATS as the database of record for this information.</p> <p>Both the LR and LNSP MUST be added to the notification rules for a change of NSRD for manually read meters (Types 4A, 5 and 6).</p>																																																																																																																																								
310.	Origin			<table><tr><td>385.</td><td>Origin</td><td>22.7</td><td>CHANGE REQUEST STATUS NOTIFICATION RULES</td><td># CR5070/5071 Notification of changes should also be provided to Current LR</td><td></td><td></td><td>AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF</td></tr><tr><td>386.</td><td>Endeavour Energy</td><td>22.7</td><td>CHANGE REQUEST STATUS NOTIFICATION RULES</td><td>Procedural improvement: The LNSP needs to be notified of these Change Requests because it is initiated by the Current MDP who may not be the LNSP. However consistent with current practice, the notification should only be provided if the Change Request was initiated by a MDP that is not affiliated with the LNSP.</td><td></td><td></td><td>AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF</td></tr></table> <p>24.7. Change Request Status Notification Rules</p> <p>The Change Request Status Notification Rules for the Change Reason Codes identified in section 24.1 are specified in Table 24-2.</p> <p>Table 24-2 – Change Request Status Notification Rules”</p> <p>CR Code – 5070 – Update Next Scheduled Read Date CR Code – 5071 – Update Next Scheduled Read Date – Retrospective</p> <p>PARTICIPANT ROLE – Receives Notification of Change</p> <table><tr><th rowspan="2">Status Change</th><th colspan="2">FRMP</th><th colspan="2">LR</th><th colspan="2">LNSP</th><th colspan="2">MDP</th><th colspan="2">MPB</th><th colspan="2">RoLR</th><th colspan="2">RP</th></tr><tr><th>N</th><th>C</th><th>N</th><th>C</th><th>N</th><th>C</th><th>N</th><th>C</th><th>N</th><th>C</th><th>N</th><th>C</th><th>N</th><th>C</th></tr><tr><td>CANCELLED</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>COMPLETED</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>-</td><td>-</td><td>-</td></tr><tr><td>OBJECTED</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>PENDING</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>REJECTED</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>REQUESTED</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr></table> <p>** N = New Role, C = Current Role.</p> <p>As per Origins first response the 5070 and 5071 needs to be provided to the LR in the COMPLETED role</p> <p>Whilst the MDFF contains the NSRD when it is provided to the LNSP and LR the LR does not then receive any updates for any subsequent changes to the NSRD</p> <p>As the LR origin need to be able to follow up missing market data via a PMD but cannot do so until the NSRD has passed – as we are not informed of any updates to the NSRD then we are both unable to know if the data has changed and are then subsequently raising PMD’s for the data when it is not yet due.</p> <p>This change was previously agreed at the BMRG and was pending the next consultation in the market to be implemented.</p>	385.	Origin	22.7	CHANGE REQUEST STATUS NOTIFICATION RULES	# CR5070/5071 Notification of changes should also be provided to Current LR			AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF	386.	Endeavour Energy	22.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Procedural improvement: The LNSP needs to be notified of these Change Requests because it is initiated by the Current MDP who may not be the LNSP. However consistent with current practice, the notification should only be provided if the Change Request was initiated by a MDP that is not affiliated with the LNSP.			AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF	Status Change	FRMP		LR		LNSP		MDP		MPB		RoLR		RP		N	C	N	C	N	C	N	C	N	C	N	C	N	C	CANCELLED	-	-	-	-	-	-	-	-	-	-	-	-	-	-	COMPLETED	-	Yes	-	-	-	-	-	-	-	-	-	-	-	-	OBJECTED	-	-	-	-	-	-	-	-	-	-	-	-	-	-	PENDING	-	-	-	-	-	-	-	-	-	-	-	-	-	-	REJECTED	-	-	-	-	-	-	-	-	-	-	-	-	-	-	REQUESTED	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
385.	Origin	22.7	CHANGE REQUEST STATUS NOTIFICATION RULES	# CR5070/5071 Notification of changes should also be provided to Current LR			AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF																																																																																																																																					
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311.	AusNet Services			<p>Regarding Table 24.2 AusNet Services believes the LNSP still requires this notification. The NSRD may change and a new MDFF will not be sent when a NSRD changes therefore the LNSP will have incorrect information in their systems.</p> <p>MSWG 18 months ago updated the MDFF to advise that the NSRD in the MDFF was for informational purposes only and the Data Base of Record for NSRD was MSATS.</p>																																																																																																																																								
312.	CitiPower & Powercor			<p>Table 24.2 – the current LNSP should receive a notification at the completed stage.</p> <p>Required for sites where the LNSP is not the MDP i.e. Type 4A sites.</p> <p>AEMO’s response to this comment during the 1st round of consultation is incorrect – the MDFF should not be used – MSATS should be used as the source of truth for NSRD.</p>																																																																																																																																								

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313.	Endeavour Energy			<p>We submitted comments in the initial consultation and have noted AEMO's response of 'AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF' and wish to provide further feedback.</p> <p>AEMO have suggested that the LNSP could obtain the NSRD from the MDFF however when the NSRD is changed without changes to the metering data amendments the LNSP is not notified of the change in NSRD via the MDFF. An example scenario is when three months of forward estimated metering data is provided and the NSRD is changed to bring the NSRD forward by a week – in this scenario the NSRD will be updated in MSATS but the metering data may not change. In addition the MDFF states that 'The NSRD provided in this file is accurate at the time the file is generated (noting this may be subject to change e.g. if route change etc.). MSATS is the database of record, therefore, should there be a discrepancy between the NSRD Date in this file, MSATS shall prevail.'</p> <p>Procedural improvement: The LNSP needs to be notified of these Change Requests because it is initiated by the Current MDP who may not be the LNSP. However consistent with current practice, the notification should only be provided if the Change Request was initiated by a MDP that is not affiliated with the LNSP or for a type 5 or 6 meter.</p>	
314.	United Energy			<p>Add LNSP as a recipient of the 507x CR transactions for COMPLETED status into Table 24-2</p> <p>MSATS is the source of truth for the NSRD for Type 4a, therefore it is critical that this is provided to the LNSP as it is required to determine when meter data is missing and enable billing.</p> <p>UE acknowledges that the MDFF Specification includes NSRD on the NEM12, but it clearly states that 'for any discrepancies in the NSRD, refer to MSATS as the source of truth for NSRD'.</p> <p>The LNSP cannot rely on the data within the NEM12 file, as it may not be received in a timely manner AND is not the source of truth for market standing data.</p>	
315.	AGL	25.4	LNSP Requirements (5001 ONLY)	<p>Drafting – para starting the New LNSP...</p> <p>Suggest</p> <p>The LNSP assigned under this transaction must have been the current LNSP for the retrospective period the transaction applies to, must..</p>	AEMO does not believe the suggested change is required as there is no current LNSP for the period of this CR, and all roles are New as they are specified on the CR and don't exist in MSATS for this period. They will be the current LNSP from the day after (i.e. in the period where the NMI exists in MSATS).
316.	Active Stream	26.	Maintain NMI – Change a NMI – SMALL OR LARGE	Suggest splitting CR in to NMI status updates and NMI general info updates, or at least some sort of identifier to stipulate that status is being changed.	AEMO does not find compelling reasons to proceed with this change, and notes that this change will impact LNSP systems.
317.	Red Lumo	26	Maintain NMI – Change a NMI – SMALL OR LARGE	Refer comments within section 12 below - Other Issues Related to Consultation Subject Matter	Noted
318.	Red Lumo	26.5	Timeframe Rules	The table is missing for CR Code 5051 – Change NMI Details – Retrospective	Agreed
319.	AusNet Services	26.6	Objection Rules	<p>Under what circumstances would an MDP object to a change of NMI details?</p> <p>section 4.6 iii states that objection logging period of 0 means no objections allowed.</p> <p>due to MSATS batching processes the participants would not receive this notification in time to object on the same day it's raised (as per feedback from AEMO round 1 consultation)</p>	<p>The following are scenarios when the MDP can object to this CR:</p> <ul style="list-style-type: none"> - NMI to be made extinct but meter still being read - NMI made active but no meter details available <p>AEMO will be deleting the last statement in section 4.6(b)(iii) about an objection logging period of zero means no objections as this is not correct, and will be adding a note in CR 505x in the Objection Rules section to say that "objection logging period of zero means objections needs to happen by the midnight of the business day that the change request is submitted". AEMO believes that there is no issue with the current objection timing on this CR as the MSATS records shows that MDPs successfully placed objections within the specified objection logging period.</p>
320.	Pacific Hydro			The current MDP can object according to Table 24.6 but in Table 24.5, there are zero days to lodge the objection.	
321.	Ergon	28	Maintain NMI – Change NMI Embedded Network (Child) – SMALL OR LARGE	<p>Embedded Network Manager Rule Change:</p> <p>Ergon Energy notes that the Customer Classification Code for Child NMIs required.</p>	AEMO suggests the participant raises this request through the regular Change Request process as this is not related to the Metering Competition, Embedded Network, or MRP rule changes.
322.	Ausgrid	28.1	Application [5060 5061]	<p>Ausgrid contends these change requests are superfluous. Given the solution has adopted the re-purposing of the LNSP role to accommodate for the ENM, the corresponding LNSP change requests (CR5050/CR5051) should suffice providing the 'Child Name' can be populated.</p> <ul style="list-style-type: none"> Given the ENM is assuming the LNSP role in MSATS, it is logical the two participants use the same suite of change requests. 	AEMO does not agree with the proposed change as CR505x does not allow child EN name to be changed, therefore 506x still required.

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323.	Ausgrid	30.6	Objection Rules	Ausgrid understands the 5090/5091 allows a new ENM to update the ENM (LNSP) role. If this is the case, the current ENM (LNSP) must be able to object to avoid an unwarranted change in roles.	Agreed
324.	Red Lumo	31.1	Application [6100 6110]	<p>Confirmation required that the correct section has been referenced in the following statement: Section 29 applies to the following Change Reason Codes</p> <p>Suggested change to include 'New' for ENM as this transaction is limited to a New LNSP, likewise should be applied to a New ENM</p> <p>CR6100</p> <p>Used where the New LNSP or the New ENM is required (either by a regulatory change or due to an error in the NMI Master Record) to apply a Prospective Change to the name of the Current LNSP in MSATS</p> <p>CR6110</p> <p>Used where the New LNSP or the New ENM is required (either by a regulatory change or due to an error in the NMI Master Record) to apply a Retrospective Change to the name of the Current LNSP in MSATS</p>	Agreed
325.		31.3	Initiation Roles	<p>Suggested change to include 'New' for ENM as this transaction is limited to a New LNSP, likewise should be applied to a New ENM.</p> <p>A New LNSP or New ENM may initiate a Change Request to change a LNSP in MSATS in accordance with section 31.4.</p>	
326.		31.4	LNSP or ENM Requirements	<p>Suggested change to include 'New' for ENM as this transaction is limited to a New LNSP, likewise should be applied to a New ENM.</p> <p>The New LNSP or New ENM must</p>	
327.	Active Stream	32	Change Role – Change MDP – SMALL OR LARGE	Why have MDP obligations been removed? How about 1500 on 6200?	<p>The MDP obligations has been removed to eliminate duplication, as their obligation was only about the ability to object and this is clear in section 32.7 Objection Rules.</p> <p>AEMO agrees to add CR1500 on CR6200.</p>
328.	AGL			<p>This section should all be section 32.</p> <p>For the proposed change date the prospective period is 65 bus days; which may not be the actual change date. Hence, a CR 1500 is required to provide the actual change date.</p>	
329.	Ausgrid			<p><u>CR6200 Series - Relationship with CR1500</u></p> <p>Ausgrid contends AEMO's statement, 'CR1500 is irrelevant in the context of the CR6000 series', is incorrect. If the current MC or FRMP nominate a prospective change in MDP, only the MDP can verify they are in fact reading the metering installation - This is the purpose of the CR1500. In the event a MDP is nominated and they are not reading the metering installation, they will be forced to object to the change request rather than seeing it as a trigger to commence reading the metering installation.</p> <p>Ausgrid note that all other Prospective Transactions that update the MDP Role are linked to the CR1500 process:-</p> <ul style="list-style-type: none"> CR 1000, 1030, 1080, 1083, 6800 <p>Ausgrid ask why AEMO believe the 6200 should be excluded from the CR1500 process? The 6200, with respect to the MDP, has the same functionality as a 6800.</p>	
330.	United Energy	32.1	Application [6200 6210]	<p>Point B – CR1500 Initiation Rules:</p> <p>Can you please specify for which transactions the CR1500 is expected to be used to provide the Actual Change Date?</p> <p>The current wording of the CR1500 is inconsistent, as it refers only to provision of an actual change date for a transfer (CR1xxx transactions).</p> <p>If the intention is for this to be utilised to confirm the actual meter churn date, a clearer explanation of this intent, and the transactions it will be used for (e.g. CR1xxx, CR6xxx, CR309x) is required.</p>	<p>Where a CR1500 is required, the MDP will get a request to provide it (i.e. clause 7.5 (b)). CR1500 is not required for type 7 metering installation hence it is not appropriate to specify it on every CR.</p>
331.	AGL	37	Change Role – Change MPB or MPC or both – SMALL OR LARGE	<p>This section should all be section 37.</p> <p>Suggested rewording : MPB and/or MPC which means the same and is more succinct than: MPB or MPC or both</p>	<p>The expression 'and/or' has been found elsewhere in these documents and removed. It has been derided in judicial circles for a long time. One judge even called it a 'bastard conjunction'.</p> <p>AEMO wishes to avoid it as can give rise to difficulties in determining what the drafter meant. We understand it is commonly used in everyday language (even in business), however, these documents are subordinate legal instruments to which we should apply good drafting principles.</p>
332.	Active Stream	38.3	Initiation Roles	A new MC can also initiate a CR to make themselves MC and change the MP/MDP	A new MC cannot be an initiating role for CR68xx, as the it cannot appoint service providers until it is the current MC.

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333.	Red Lumo	38.4	FRMP Requirements	Confirmation required if the correct acronym has been applied in the table for: (d) Populate a Change Request with one or more of the following As per the proposed table the role has been updated as MC where the role code is RP	Agreed
334.	Active Stream	38.6	MDP Obligations	(a) Sentence is misleading. If the meter has not been installed then the 1500 cannot be initiated.	AEMO believes the current sentence is clear as the use of CR1500 is clear within the procedure.
335.	United Energy			(38.6) Can you please clearly articulate that the MDP should be using the CR1500 to meet requirement (a) to provide linkage back to the CR1500 definition. As mentioned earlier, the definition of the CR1500 is unclear as to which scenarios require it to be sent.	Where a CR1500 is required, the MDP will get a request to provide it (i.e. clause 7.5 (b)). CR1500 is not required for type 7 metering installation hence it is not appropriate to specify it on every CR.
336.	AusNet Services	38.6	MDP Obligations	Regarding 38.6(a) we considers there is no need to have the change reason code in this clause as an RDATE is sent for both CR's. Regarding 38.6(b) we recommend not changing the reference for "actual date" to the "proposed date". This cannot be the proposed date. The CR may have a proposed date of for example the 1/7/2016 but if the MP for whatever reason did not install the meter until the 10/7/2016 the MDP would miss this obligation because these role changes are to occur in line with the meter exchange. The obligation should be Actual Change date. In this example, if would mean the MDP has until the 12/7/2016 to send the change date before it has not met it's obligations.	38.6 (a) RDATE is not sent for 6801 i.e. CR 1500 not required. 38.6 (b) applies where Meter Reading not required. If new meter is installed, then a meter read is required.
337.	Red Lumo	41.1	Application [5100 5101]	For consistency suggested change: CR5100 Used where AEMO identifies a requirement for an urgent Prospective Change (i.e., in less time than it would take to change that data item, because of the allowance for an Objection Logging Period) to MSATS data about a <i>connection point</i> or where several data items that normally can't be changed in the same transaction must be changed at the same time. CR5101 Used where AEMO identifies a requirement for an urgent Retrospective Change (i.e., in less time than it would take to change that data item, because of the allowance for an Objection Logging Period) to MSATS data about a <i>connection point</i> or where several data items that normally can't be changed in the same transaction must be changed at the same time.	Agreed
338.	AusNet Services	41.4	AEMO Requirements	f) change from meter read type to read type code refer comment 3 in general comments	Agreed
339.	Ergon	42.3	Requesting Participant Requirements	Embedded Network Manager: Ergon Energy notes that clause 42.3 (g) – should include Customer Threshold Code.	AEMO suggests the participant raises this request through the regular Change Request process as this is not related to the Metering Competition, Embedded Network, or MRP rule changes.
340.	AGL	43.1	Introduction	NMI discovery should be available to MC, MP, MDPs	AEMO does not believe this change is necessary as once those parties are nominated on a change request they can request a C7 report.
341.	AGL	43.3	Request a NMI Discovery Search	43.3.1 NMI discovery Search 1-NMI Search Rules cl(j): Need to include MC/MP/MDP in search response as this will be crucial for new FRMPs establishing requirements for customer contracts	AEMO does not believe this change is necessary as once those parties are nominated on a change request they can request a C7 report.
342.				43.3.2 NMI discovery Search 2 – • Table 43.3: Need to include MC in search results • Correct the table heading....currently reads.....for a search 2 search . Is this correct or should it read:for a Stage 2 search. Also Table 43J The numbering of tables in section 43 is inconsistent - numerical or alpha - consistency	Agreed
343.				(43.3) Under NMI Discovery Search 2 - can AEMO please establish the ability for the FRMP-appointed MC/MPB for a site to perform this search to identify the Network Tariff Code for the site. This information is critical for the MPB to understand the current Network Tariff for a site <u>when planning</u> a meter installation so that they do not unnecessarily install and configure a meter which is not compatible with the Network Tariff. Ability for the MC/MPB to view this information prior to initiation of a meter installation will prevent downstream tariff incompatibility and network billing issues.	AEMO does not believe it is necessary for the MP/MC to access NMI discovery to access Network Tariff Code, and AEMO is currently considering adding the Network Tariff Code to the C7 report which will provide the participants with the information they need.

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				There doesn't appear to be any information in this list which would be deemed sensitive or anti-competitive such that the MC/MP for a site should be prevented from viewing it if they have been nominated by the FRMP ...	

Table 7 – MSATS Procedures: Procedure for the Management of WIGS NMIs

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	Endeavour Energy		Whole document	The feedback provided for the CATS Procedure would also apply to the equivalent sections and clauses in the WIGS Procedure	Noted
2.	AusNet Services	2.7.	MPB Requirements	This section has been removed from the CATS procedures. does it still hold any relevance in WIGS. This is just a transfer of FRMP CR which is not subject to a meter change.	Agreed, section will be deleted
3.	Aurora	2.10, 3.9, 5.7, 6.7, 21.6, 23.6, 24.6, 26.6, 27.6	Objection Rules	Objection period to be kept at 5 days, small retailers such as Aurora Energy do not have the resources or have an automated system to object. Objections are likely to increase substantially as participants will have not enough time to review the CRs and, as a result, they will just object to be able to have time to review it.	Refer to section 4.4 in the POC Procedures Final Report and Determination
4.	Energy Australia	6.7, 7.6, 8.6, 9.6, 17.6, 18.6, 19.7, 20.6, 21.6, 24.6, 26.6, 27.6, 28.6, 30.4, 31.4	Objection Rules	Please see General Feedback Re: Objection rules.	
5.	AGL	3.4.	FRMP Requirements	Original comment: clause (f) There is no RP only MC	Agreed
6.	AusNet Services	5.4.	LNSP Requirements	c) move Change Reason Code to the top of the table to make it consistent with the other sections	Agreed
7.	Aurora	9.4.	MPB Requirements	MPB requirements to make Suffix a mandatory field as well as the register ID, this will help participants identify the data stream against the register. For example Reg 1 Suffix E1, this enables participants to confirm the for example if the stream is generation (B1)/ consumptive (E1). Remove Suffix from the “may” section.	AEMO agrees with participants to make the ‘MDM Contributory Suffix’ field mandatory on all the Create CRs which are (2500,2501,2520,2521,3000,3001, 3004,3005,3080,3081,3090), however it will still be kept optional on the Update CRs for compatibility with existing records. AEMO clarifies that the details in the MDM Contributory Suffix will no longer relate to the MDM data stream suffix table. The new definition of the MDM Contributory Suffix is: a suffix as per the NMI procedure to identify the stream of meter data, and is consistent with the suffix contained in the MDFF data file as opposed to the suffix recorded in the MDM data stream table. AEMO will be reviewing and updating the Standing Data for MSATS document to reflect this change as part of work package 3.
8.		10.4.	MPB Requirements	MPB requirements to make Suffix a mandatory field as well as the register ID, this will help participants identify the data stream against the register. For example Reg 1 Suffix E1, this enables participants to confirm the for example if the stream is generation (B1)/ consumptive (E1). Remove Suffix from the “may” section.	
9.		11.4.	MPB Requirements	MPB requirements to make Suffix a mandatory field as well as the register ID, this will help participants identify the data stream against the register. For example Reg 1 Suffix E1, this enables participants to confirm the for example if the stream is generation (B1)/ consumptive (E1). Remove Suffix from the “may” section.	
10.	AusNet Services	9.4.	MPB Requirements	c) refer to comment 2 in general comments in the CATS response. d) what are the ????	Noted Agreed and error is corrected

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11.	United Energy	9.4	MPB Requirements	UE supports AusNet's comments – MPB's cannot be expected to be aware of all of the different network tariffs and their structures and therefore it should not be a mandatory field that they populate. LNSPs are in a much better position to be able to provide this information.	Refer to section 4.5 in the POC Procedures Final Report and Determination
12.		10.4.	MPB Requirements	UE supports AusNet's comments – MPB's cannot be expected to be aware of all of the different network tariffs and their structures and therefore it should not be a mandatory field that they populate. LNSPs are in a much better position to be able to provide this information.	
13.		11.4.	MPB Requirements	UE supports Ausnets comments – MPB's cannot be expected to be aware of all of the different network tariffs and their structures and therefore it should not be a mandatory field that they populate. LNSPs are in a much better position to be able to provide this information.	
14.	AusNet Services	10.4, 11.4	MPB Requirements	e) refer to comment 2 in general comments in the CATS response.	Noted
15.	AusNet Services	16.5.	ENM Requirements (5021 only)	e) this would not be required as the ENM would only be updating child NMI's.	AEMO believes that "embedded network parent name" can still be required in the cases where a Child NMI is a parent of another embedded network (noting we have had this scenario in the NEM). AEMO clarifies however that the child EN name should not be the same as the parent EN name for the same NMI.
16.	AusNet Services	21	CHANGE ROLE – CHANGE LNSP	Can this be used to change the EMN on child NMI's just like it can be in CATS?	Agreed
17.	AGL	27	Change Role – Change MPB and / or MPC	Suggest changing the header to: MPB and /or MPC rather than current MPB or MPC or Both	<p>Although the example cited relates to a heading, the use of 'and/or' has been found elsewhere in these documents and removed. It has been derided in judicial circles for a long time. One judge even called it a 'bastard conjunction'.</p> <p>AEMO wishes to avoid it as can give rise to difficulties in determining what the drafter meant. We understand that it is commonly used in everyday language (even in business), however, these documents are subordinate legal instruments to which we should apply good drafting principles.</p>

Table 8 – MSATS Procedures: MDM Procedures

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE				
1.	AGL			Please review for the use of term Basic Meter and update to accumulation meter through procedure Examples provided below in table	Noted and addressed.				
2.	ActewAGL	2.2	AEMO	Need to include paragraph numbering; (a) The MDP must carry out the following Validations for manually read interval metering installations with CT after any changes to a metering installation prior to the distribution of any interval metering data to AEMO or Registered Participants for the purposes of settlements:	The listed clause cannot be found in the MSATS WIGS procedure				
3.	Origin	2.2	AEMO	<table><tr><td>Red//LUMO Energy</td><td>2.2</td><td>AEMO</td><td>Marginal Loss Factors (MLFs) to be included in the glossary</td></tr></table> Origin agrees with Red/Lumo that MLF need to be included in the Glossary. The purpose of the Glossary is defined as intent to 'assist users ...in understanding the overall framework.' Would seem sensible to include definitions if requested by participants as this would meet the requirements of helping industry understand the terms. Wouldn't matter whether the term is used once or twenty times – if it helps provide clarity and is a term that is relevant then it should be included.	Red//LUMO Energy	2.2	AEMO	Marginal Loss Factors (MLFs) to be included in the glossary	<p>We understand the principle, however, the expression MLF literally only occurs once and where it occurs, there is an explanation of its meaning. There is no added value if we also include it in the Glossary.</p> <p>The Glossary will expand over time, not only to include all the B2B terms, but also to include all terms that occur more than once. To include every single possible term would make the document unwieldy and unmanageable.</p>
Red//LUMO Energy	2.2	AEMO	Marginal Loss Factors (MLFs) to be included in the glossary						
4.	ActewAGL	3.1	Introduction	Need to include paragraph numbering; MDM comprises two broad areas of functionality – setup functionality and processing functionality. This section outlines the basic features of this functionality. (a) The setup functions are performed initially, whilst commissioning the MDM system, or periodically at random intervals. (b) The processing functionality is performed regularly as work that is preliminary to each settlement run.	Agreed.				
5.	AGL	3.2.3(b) 3.2.3(c)	.. NSLP Profile	Review terminology Change Basic Meter to accumulation meter for consistency Subtract any non-interval (accumulation meter)...	Agreed.				
6.		3.2.8	Processing Functionality	2 nd para ...profile accumulation meter readings.					
7.		3.2.9	Basic Meter Profiling	Suggest a slight re-wording of this section as the terminology now refers to Accumulation meters. Eg ...non Interval datastream (accumulation meters)					
8.		3.2.11(j)		... next the system will calculate the accumulation meter interval load....					
9.	AusNet Services	3.2	Setup Functionality	Regarding 3.2 AusNet Services considers that all other documents refer to accumulation instead of basic. Should this be updated for this document too? Please update throughout this section. Regarding 3.2.11 and Figure 2 we suggest making Datastream consistent with the glossary.					
10.	Red Lumo	3.2	Setup Functionality	3.2.3. Characteristics of the NSLP Profile (b) & (c) have the term Basic. We recommend that for consistency throughout the procedures this should be updated to Accumulation ++++++ 3.2.6. MDM Settlement Data Processing, the following statement is to be updated from Basic to Accumulation for consistency: Settlement Data Processing consists of profile calculation (Profile Preparation Service for non NSLP and NSLP), profile application (Basic Meter Profiling for non NSLP and NSLP) and settlement energy (load) aggregation ++++++ 3.2.7 Processing Functionality, same comment as above update Basic to Accumulation ++++++					

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				<p>3.2.8. Profile Preparation Service (PPS) same comment as above update Basic to Accumulation ++++++</p> <p>3.2.9. Basic Meter Profiling (BMP) same comment as above update Basic to Accumulation. In this case the acronym will change and will require updates throughout all procedures and documents where this is applied. ++++++</p> <p>3.2.10 Settlement Load Aggregation same comment as above update Basic to Accumulation ++++++</p> <p>3.2.11. Processing Overview same comment as above update Basic to Accumulation.</p>	
11.	ActewAGL	9.2	Report Outlines	Consider formatting and possibly for every “Report Name”, number them 9.2.1, etc	Agreed.
12.	AGL, Energy Australia	9.2	Report Outlines	Note – Stage 1 AEMO response does not align with initial AGL submission – comments re-submitted In general, now that the MP/MDP is contracted to the MC, any report should include MC – either as a recipient or as part of the output.	Refer to AEMO’s response on each report below
13.			MDM RM9	MC should have access to this report to manage the quality control of their MDP	AEMO does not believe that the MC should have access to this report, as in MDM only the roles FRMP, LR, and MDP are held with the metering data
14.			MDM RM11	MC should have access to this report to manage the quality control of their MDP	AEMO does not believe that the MC should have access to this report, as the main user of this report is the MDP in managing their data delivery to MSATS.
15.			MDM RM16	MC should have access to this report to manage their responsibility for the provision of data by the MDP	AEMO does not believe that the MC should have access to this report, as this report is provided to FRMP, LR, and MDP for reconciling their settlementd of energy.
16.			MDM RM17	MC should have access to this report to manage their responsibility for the provision of data by the MDP	AEMO does not believe that the MC should have access to this report, as this report is provided to FRMP, LR, and MDP for reconciling their settlementd energy.
17.			MDM RM18	This report is required with the MC as one of the output variables	The MC is already listed as a party to access this report
18.			MDM RM22	MC should have access to this report to manage their responsibility for the provision of data by the MDP	AEMO does not believe that the MC should have access to this report, as this report is provided for reconciling settlementd energy
19.			MDM RM 26	MC should have access to this report to manage their responsibility for the provision of data by the MDP	AEMO does not believe that the MC should have access to this report, as this report is provided for reconciling settlementd energy
20.	United Energy	9.2	Report Outlines	<p>In MDM reports which currently include Suffix as a report output field, include RegisterID as a new field to align with it now being Mandatory in the MDFF Specification.</p> <p>This will be required to complement the NMISuffix (which is currently on the reports) for use by the recipients of meter data, enabling better reconciliation of meter data discrepancies.</p>	AEMO believes that it is not possible to proceed with the suggested change as there is no mechanism to link the register identifier suffix (register Identifier Table) with the metering data (Datastream table) in MDM.