

MSATS Standing Data Review

- MSDR Issues Paper
- MSATS Procedures – WIGS
- MSATS Procedures – CATS
- Standing Data for MSATS Guideline
- Retail Electricity Market Procedures
Glossary & Framework

CONSULTATION – Draft Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services (inclusive of Mondo)

Completion Date: 5/6/2020

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1. Context

This template is to assist stakeholders in giving feedback to the questions raised in the Draft Report about the proposed changes to the MSATS Standing Data.

2. Questions raised in the MSATS Standing Data Review Draft Report

2.1 Material Issues

Information Category	Question No.	Question	Participant Comments
Type 4a Metering Installation (MRAM) Reason	1.	What are the key issues for AEMO to consider in working with stakeholders to explore with the AEMC the potential benefits of enhanced access to exception information?	The Type 4a (MRAM) Reason field is supported , as it provides participants greater visibility to the reason why the site is being manually read.
Metering Installation Transformer Information	2.	In the cases where transformers have dual secondary windings or more (500kV : 110V : 110V), how would participants prefer to see those represented in the enumerated list for VT Ratio, keeping in mind that a transformer can have up to five secondary windings?	<p>We agree with representing secondary + VT Ratio as per the example provided, however we reiterate that nearly all recent CT/VT installations are performed by the Metering Coordinator or customer's REC. Therefore as LNSP for these HV sites with contestable metering, no records really exist in our systems as they are not network assets and are all maintained by the contestable MC.</p> <p>It would be difficult to ascertain data conclusively and accurately for those existing VTs, and report on whether they have dual</p>

Information Category	Question No.	Question	Participant Comments
			<p>connections anyway. Consideration needs to be given on how existing sites will have their values populated and what would be a suitable transition period.</p> <p>CT/VT Validations The current transformer type/ ratios proposed only allow for various configurations where the tapping of the CTs may be 30/5, 50/5, 100/5 etc. However, secondaries of the current transformer may also be “1 Amp” as opposed to the traditional “5 Amp” CTs. These types come once again with different available ratios.</p> <p>Additionally, for HV CTs, the proposed CT type field is not relevant, therefore strict validation should not apply for HV CTs to use the CT Type. Example: S type LVCT – 200/5. For HV, the CT may have 200/5 single tap or a multi-tap with various possible ratios 50-100-200/5. The CT Ratio is sufficient for HV CTs. Careful consideration is required before any validation is applicable to HV CTs.</p> <p>Agree with the current statement in the draft determination, that for some existing HV sites, CTs do have dual core windings.</p>

Information Category	Question No.	Question	Participant Comments
			The proposal to include this information may not be beneficial to the market
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	<p>Since AusNet Services acts as both MP, MC & LNSP for small sites this information is known at time of connection. It would be rare for this information to change status once established, therefore we recommend that the easiest way would be for a metering service provider to email the LNSP directly, the LNSP can then trigger a CR50xx manually to update MSATS.</p> <p>This method avoids amendments to CATS or new B2B transactions.</p> <p>The volume (at least on AusNet Services network) does not justify any changes to B2B processing.</p>
GPS Coordinates	4.	Please explain the benefits for expanding the GPS coordinates field to cover all NMIs given this would be a significant cost? For example, some multi-floor buildings would have the same GPS coordinates so you may also need to have elevation for which floor (assuming metering on each unit)?	<p>The cost to record GPS coordinates with any dependable level of accuracy is significant, notwithstanding that a quantified benefit has not been articulated.</p> <p>GPS coordinates may have some benefits for remote or rural sites, but no benefit for urban sites. However, we consider that even the</p>

Information Category	Question No.	Question	Participant Comments
			<p>application of GPS coordinates for existing remote or rural is not warranted.</p> <p>AusNet Services does not support capturing GPS coordinates for existing NMs.</p> <p>Processes can be established to capture GPS coordinates going forward, however identifying the GPS coordinates for existing rural sites would be difficult in specific geographical areas (e.g. high country) and would be highly costly to achieve with accuracy.</p> <p>AusNet Services strongly recommends making this field 'Required' and NOT mandatory. A long transition period would also be required to accurately locate remote or rural sites.</p> <p>Furthermore, as the vast majority of meters in Victoria are DNSP supplied AMI meters and policy makers have decided for this to continue well beyond 2021 it is unlikely that establishing GPS coordinates for existing meters would deliver any benefits to Victorian customers only costs. A sensible proposition would be to delay the application of any such mandate applying to existing NMs in Victoria until such a time when electricity law in Victoria allows metering contestability for small customers.</p> <p>AusNet Services does not support capturing GPS Co-ordinates for manually read meters,</p>

Information Category	Question No.	Question	Participant Comments
			<p>especially in Victoria as there is no identified benefit for this, moreso with meter contestability not applicable in Victoria across small metering (VICAMI).</p> <p>Additionally, the draft report states that the GPS coordinates to be populated will relate to the meter location and not just the property location, which makes sense in rural areas. Making this field mandatory would pose difficulties for no or restricted access sites. Would exemptions apply for non access sites? Or would it be best endeavours and we use the property GPS co-ords, which would largely defeat the purpose in rural areas?</p>
	5.	<p>AEMO has applied the definition of rural using the 'Designated regional area postcodes' to gain consistency in approach, however feedback indicates a mixed response to this option. Is there an alternate NEM wide definition that can be applied across the NEM? AEMO notes, for example, in Queensland NMIs are required to be classified as urban, short rural and long rural for Guaranteed Service Levels. Is there something similar to this in other jurisdictions and can it be applied there?</p>	<p>The AER has definitions for short rural and long rural feeders based on line length from the zone sub in relation to their reliability measures. This may be more accurate than using purely postcodes.</p> <p>AusNet Services would prefer to use this existing definition already in electricity law.</p> <p>It may also be feasible and more accurate to use a combination of Feeder length (as per AER definition) and postcode.</p>

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	6.	Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.	<p>AusNet Services does not support using "Postcode" to define an area as "Rural".</p> <p>There are many postcodes in the AusNet Services distribution area that include both urban (majority portion) and rural sites.</p> <p>e.g. Postcode 3825 has 22 towns listed, most of the sites included are urban rather than rural.</p>
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	AusNet Services does not utilise this field.
	8.	Are there other fields that may be suitable to apply this information? For example, Meter Location field with an increased character length available for the field.	<p>AusNet Services believes that the Network Additional Information is not related to Meter Location in practice. If used at all, it probably refers to Network Tariff information which is unrelated to location.</p> <p>We suggest that AEMO perform a data profiling exercise to ascertain the use of this field.</p> <p>Therefore, we do not support using the Meter Location field in lieu of the "Network Additional Information" field.</p>
	9.	Do you agree with retaining the Network Additional Information field?	If used by other participants, then AusNet Services supports retaining the field in its current state.

2.2 Data Transition

Information Category	Question No.	Question	Participant Comments
Scenarios	10.	For Removed fields, would you prefer Option 1 (retain history) or Option 2 (remove history)?	Option 2 (remove history) since the fields have no current or future use.
Scenario 2: Add a new field (Proposed Fields)	11.	For Added fields, would you prefer Option 1, 2a, 2b, 2c, 3, 4 or 5?	Option 2a) – i(b) – We assume that two-dimensional model updates require a level of reconciliation between AEMO and the participants.
	12.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	i(b) – We assume that two-dimensional model updates require a level of reconciliation between AEMO and the participants.
	13.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	N/A
	14.	If you choose Option 2c, please choose between for i(a) or i(b).	N/A
	15.	Do you have any further comment regarding the above?	We assume that two-dimensional model updates require a level of reconciliation between AEMO and the participants. First step Test Run/Report, then Second step Check/Reconcile/Commit to Database. Please confirm or clarify.

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Scenario 3: Amend an existing field (To Amend)	16.	For Amended fields, would you prefer Option 1, 2a, 2b, 3, 4 or 5?	Option 2a) – i(b) – We assume that two-dimensional model updates require a level of reconciliation between AEMO and the participants.
	17.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	i(b) – We assume that two-dimensional model updates require a level of reconciliation between AEMO and the participants.
	18.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	N/A
	19.	Please provide any further details required	We assume that two-dimensional model updates require a level of reconciliation between AEMO and the participants. First step Test Run/Report, then Second step Check/Reconcile/Commit to Database. Please confirm or clarify.
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	Option 2 – MSATS Snapshot to synchronise the data internally. AusNet Services wishes to reduce the volume of CATS Transactions in the market thereby reducing impact on participants' inbound CATS processing. Ensuring CATS Processing limits are not exceeded.

Information Category	Question No.	Question	Participant Comments
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	No. Prefer Option 2 (as above).

2.3 Other Matters

Information Category	Question No.	Question	Participant Comments
Consumer Data Right	22.	Do you agree with the proposed new fields?	<p>AusNet Services agrees with the inclusion of the new fields to support CDR as reasonable solution.</p> <p>These fields may potentially also assist LNSPs for planned outage notifications, and assist in LNSP's MDPP obligations.</p>
	23.	What types of scenarios – including specific examples – could be envisaged which would raise complexities whose resolution would be required in order to achieve the data sharing objectives?	Retailer processes would need to be more precise when triggering a change of account holder, this would resolve any arising complexities such as shared accommodation or embedded networks
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	<p>These fields should not be used by participants (unrelated parties) to target customers for commercial purposes.</p> <p>Should only be used for purposes allowed by electricity law (AEMO and retailers for data access, and LSNPs for outage interruption notices).</p>
	25.	Do you agree with the timeframe for updating the data in these fields?	N/A as data proposed to be provided by Retailers.

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	26.	Are there other suggestions to help meet the ACCC's objective?	AEMO should provide a capability for the end-user (current account holder) to enquire regarding who has visibility/access to their consumption data.
	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	<p>AusNet Services has minimal issues with incorrect NTC in Vic.</p> <p>We actively trigger an update to the Network Tariff Code once a CR30xx is completed in the market to ensure the data is correct.</p>
	28.	<p>If AEMO was to review the obligations on NTC, out of the options proposed, which do you see being the most effective to address the current issues experienced. Please provide reasons as to why you think the options you've chosen would address the issue.</p> <ul style="list-style-type: none"> a) Compliance options for MPB performance for incorrectly populating NTC b) Retailer obligations to inform the MC and MPB of the appropriate NTC c) Network obligations to correct an incorrectly populated NTC within three business days; and or d) If networks are provided the obligation to populate NTC then they will have only three business days to correctly populate this after the metering installation details are provided by the MPB, this will ensure there are not 	<p>Option c).</p> <p>Under current obligations, the DNSP should be ensuring the NTC is correctly applied once a metering installation has been completed. The DNSP must abide by the AER's approved tariffs determinations in doing so.</p>

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		additional delays to the commissioning of the meter in MSATS	
	29.	Do you have any comments on the options provided by Endeavour Energy?	<p>Option 1.</p> <p>In general, we agree that the LNSP should control the assignment of the NTC. This can be achieved by coordination with the MPB and through the establishment of default tariff structures not dependant on metering configurations. This is our current practice.</p> <p>Changing the current process would need to be justified with a cost/benefit assessment.</p> <p>Since the NTC is assigned per register, the LNSP requires the meter installation to be established before setting the appropriate NTC.</p> <p>Therefore, out of the two options Endeavour Energy presented, option one would be the most viable. However, AusNet Services still prefers the current process remaining unchanged.</p>

3. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments
4.1.4 / 4.3.4 / 7.1.4 GNAF PID	This field should not be mandatory for a LNSP to populate for existing NMIs, the procedure should clearly state that AEMO will be responsible for populating GNAF PID based upon a given structured address (as provided by the LNSP)
4.1.4 / 4.3.4 / 7.1.4 Section Number	We recommend the procedure should clearly state that field is only required for NSW
4.1.4 / 4.3.4 / 7.1.4 DP Number	We recommend the procedure should clearly state that field is only required for NSW
House No To	We consider it is unreasonable to expect LSNPs to HouseNumTo for existing sites. Will AEMO perform the splitting of the HouseNumTo fields or data cleansing required in MSATS?

4. Proposed Changes in MSATS Procedures - CATS

Section No/Field Name	Participant Comments
9.1.4 / 9.3.4 / 12.2.4 GNAF PID	This field should not be mandatory for a LNSP to populate for existing NMIs, the procedure should clearly state that AEMO will be responsible for populating GNAF PID based upon a given structured address (as provided by the LNSP)
9.1.4 / 9.3.4 / 12.2.4 Section Number	We recommend the procedure should clearly state that field is only required for NSW
9.1.4 / 9.3.4 / 12.2.4 DP Number	We recommend the procedure should clearly state that field is only required for NSW
House Num To	We consider it is unreasonable to expect LSNPs to HouseNumTo for existing sites. Will AEMO perform the splitting of the HouseNumTo fields or data cleansing required in MSATS?

5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments

6. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments