

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: *EnergyAustralia*

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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?	<p>The key issues that need to be explore is whether the rules currently allow for this information to be provided. If not, should it be provided when it is compared to other 'customer' information that is stored in MSATS (solar, controlled load devices, etc).</p> <p>Type 4a reason is similar to the suggestion below for the new fields 'Change of Account Holder' and 'Change of Account Holder Effective Date', as they are both providing customer information. With Type 4a, the benefits of having this information arises when the initiating customer (in respect to customer refusal) vacates the property.</p> <p>There is a clear benefit in providing this information to prospective retailers/MCs; as it will improve</p>

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			<p>efficiencies (offering the correct plans/services), the customer relationship, and the roll-out of remote capability.</p> <p>The AEMC must consider whether there is a breach of customer's privacy, or if there would be adverse effects from listing the type 4a reason. They should also consider the likelihood of each, and how this compares with the benefit of listing the information.</p>
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>Secondary windings can be listed as:</p> <p>500kV : 110V : (2-5)</p> <p>PRIMARY : SECONDARY VALUE : SECONDARY #</p>
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	<p>Currently the LNSP is a notified party on S/Os sent from the MP to the retailer, it is likely the information could be advised in any of there S/O.</p> <p>There is currently no direct S/O between the MC/MP and the LNSP.</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	It is short sighted to remove urban areas from having GPS coordinates because there are many sites where meters are easy to locate. The multi-floor/occupancy example provided in the

Information Category	Question No.	Question	Participant Comments
		to have elevation for which floor (assuming metering on each unit)?	<p>consultation is the most apparent reality for why GPS coordinates should be provided for all sites; as population growth results in increasing multi-occupancy residences, it is imperative that the locations of meters are precisely located.</p> <p>The introduction of POC has created a scenario in which the meter provider can change at a customer or retailer request. This means that parties that have potentially never visited the site (for New connection, meter read etc) will have a requirement to locate the existing metering point. For this reason GPS co-ordinates are more pertinent now than ever before.</p> <p>Providing a similar cut-over period - as proposed for other changes - would reduce the cost to participants, i.e. allowing it to be required for 12 months, and then mandatory. It is understood that many meter providers (particularly those dealing with SME/C&I) already maintain GPS coordinates; where this is not currently held, meter readers can be tasked with updating the details, or additional field staff can be employed for the task.</p> <p>The consultation paper suggests that GPS coordinates would be required for new connections, which seems a confusing suggestion</p>

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			considering new installation will predominantly be remotely read, and one of the main benefits of GPS coordinates is for locating the meter, for actions like meter reading.
	5.	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?	EnergyAustralia strongly supports the inclusion of GPS coordinates for all meters, and believes the short term pain (populating the coordinates) will be worth it for the long term gain to customers and participants. Having the GPS coordinates for all meters will remove the confusion around 'rural' classification.
	6.	Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.	Yes; however, as stated above, it should be for all meters.
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	The most common use is for meter access/location information, i.e. Meter access is through access door on Smith Street.
	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.	Yes, the Meter Location field with an increased character length would be a suitable replacement for any meter location/access information previously stored in the Network Additional Information Field.

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	9.	Do you agree with retaining the Network Additional Information field?	If all information historically stored in the filed can be located in other fields (existing & proposed), then EnergyAustralia does not see a need to keep the field.

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)?	Retain history, unless this information causes confusion.
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 1. Update data via inbound CR. The process is already there, and a lot of the data will be updated sporadically across a 12-month period. Potentially split the data into two tranches, updates that can be done in bulk and data that needs longer to obtain/populate.
	12.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	N/A

Information Category	Question No.	Question	Participant Comments
	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?	-
Scenario 3: Amend an existing field (To Amend)	16.	For Amended fields, would you prefer Option 1, 2a, 2b, 3, 4 or 5?	Option 1. Update data via inbound CR. The process is already there, and a lot of the data will be updated sporadically across a 12-month period.
	17.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	N/A
	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	-
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	1

Information Category	Question No.	Question	Participant Comments
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	-

2.3 Other Matters

Information Category	Question No.	Question	Participant Comments
Consumer Data Right	22.	Do you agree with the proposed new fields?	<p>If retailers are still 'data holders', it is not clear why this needs to be in MSATS; retailers being responsible for billing, customer info, and plan data.</p> <p>If it is required, why does there need to be two fields? Can't the change of account holder only be updated from the effective date? This seems like a field that has been created to assess retailer's conformity with the NEM Customer Switching rule change!</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?	Retailers are obligated to send a CDN when a customer changes name/number/mail address. EnergyAustralia has not been able to identify an example for a specific issue.
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	The information is now more 'customer' related than 'site', therefore it runs the risk of being a breach of privacy; i.e. a participant will now be able to identify the changes at a site that have occurred since the customer has been at the property (such as solar install), they would have previously been able to identify that this had occurred at the site but not had the confirmation that it occurred during the tenure of a customer. This is still just a small risk as

Information Category	Question No.	Question	Participant Comments
			there are no identifiable details provided for the customer (name, etc).
	25.	Do you agree with the timeframe for updating the data in these fields?	Yes
	26.	Are there other suggestions to help meet the ACCC's objective?	There is no private information provided to confirm which customer was linked with the customer transfer, you will still need to reach out to the retailer to confirm. So why have the details in MSATS? The retailer is a data holder, they should be responsible for providing this information.
	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	<p>Since 1 December 2017, the retailer has updated the right NTC in the S/O, the MCs then updates the proposed NTC in MSATS.</p> <p>Once a NTC is published it is provided to the front of house team to pick the appropriate one. If the retailer has chosen an incorrect tariff, LNSPs will revert that back to the correct NTC.</p> <p>The main issue with this process is that a retailer assigning a NTC, are doing so with a lesser understanding of which NTC would be optimal for the customer, the position in the network, and the load impacts.</p>

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	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 additional delays to the commissioning of the meter in MSATS 	<p>EnergyAustralia's preference is b), as we believe retailers are best placed to manage the customer relationship.</p> <p>However, we admit there are improvements that can be achieved in the current process. Namely confirmation from LNSPs on the appropriate NTC. We do not see enough issues in this space to justify changing the current process, outside of improving communication between retailers and LNSPs.</p>
	29.	Do you have any comments on the options provided by Endeavour Energy?	-

3. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments

4. Proposed Changes in MSATS Procedures - CATS

Section No/Field Name	Participant Comments

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
New field or additional enumeration: Meter Fault Notification Family Failure	Family failure should be included, whether this is an enumerated list highlighting the family failure, or a separate section. The party requesting the exemption will outline whether the meter/NMI is family failure, AEMO then needs to update based on this. AEMO doesn't need to identify 'all family failures' it just needs to update based on the info provided by the MC via the exemption process. If AEMO wanted to update all meters impacted by the family failure, they could request the info from the MC.
Meter Fault Notification	<p>AEMO's draft determination advised that the MFN would not be updated once an exemption period passes (without meter fault being resolved), and that an exemption would remain once it has been rectified; AEMO suggesting the exemption will not be removed until the exemption period passes.</p> <p>EnergyAustralia suggests that updating the field to reflect that there is no exemption (when the exemption period passes), or once the site has been rectified, will provide more accurate and useful information to participants.</p>
Disconnection Date	<p>EnergyAustralia would like AEMO to consider the addition of a Disconnection Date field, this will provide advice to the retailer as to whether the customer is required to obtain a Certificate of Electrical Safety or other jurisdictional safety requirement.</p> <p>The benefit of this field will save time and improve the customer experience.</p>