5 June 2020

Ms Audrey Zibelman
Chief Executive Officer
Australian Energy Market Operator
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Dear Ms Zibelman

Energy Queensland's feedback on the MSATS Standing Data Review Draft Report

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide feedback to the Australian Energy Market Operator (AEMO) on the MSATS Standing Data Review Draft Report.

Energy Queensland is a Queensland Government Owned Corporation that operates a group of businesses providing energy services across Queensland, including:

- Distribution Network Service Providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network);

- a regional service delivery retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and

- affiliated contestable business, Metering Dynamics.

Energy Queensland's DNSPs, Energex and Ergon Energy Network, and Metering Dynamics have provided comments against AEMO's template reflecting their participant role.

Energy Queensland looks forward to providing continued assistance to AEMO during this review. Should AEMO require additional information or wish to discuss any aspect of Energy Queensland's feedback, please contact me on (07) 3851 6787 or Barbara Neil on (07) 4432 8464.

Yours sincerely

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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: Energex, Ergon Energy, Metering Dynamics

Completion Date: 5 June 2020

Table of Contents

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?	We note the MSATS Standing Data Review (MSDR) proposes to add an 'Exemption' field. As an exemption is required for a Type 4a installation due to NoComms but not for CustRefusal, we would propose adding an 'Exemption Type' element to the new Exemption field. By doing so the reason for a Type 4a site could then be determined by the MRAM install code and the presence or absence of a Type 4a exemption.
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?	For the purpose of populating VT details in MSATS, we feel there is only value in capturing the VT ratio details related to the secondary connected to the metering installation.

Information Category	Question No.	Question	Participant Comments
			Further, we seek clarity as to whether, if implemented, this information would need to be retrospectively populated.
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	It is our preference to use existing market transactions to provide updates of the Shared Isolation Points, i.e. NOMW.
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)?	We believe the main benefit of including GPS coordinates would be in relation to rural/remote installations, but also see some benefits moving forward with sites that are churning MPBs, as per SA Power Networks and CitiPower Powercor's statements in the Draft Report.[1]

If required to develop systems / processes to capture GPS coordinates for rural installations we would apply this to allow installations but feel there may not be significant benefits for sites with multiple installations in a shared location. Notwithstanding, we note there would be a significant cost impact for completing this data conversion activity. |
| | 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 | While Ergon Energy utilises the urban, short rural and long rural classifications, Energex does not. |

Information Category	Question No.	Question	Participant Comments
		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?	Using postcodes to determine rural areas whilst usable does create its own set of challenges. For example, post code 4702 covers the edge of Rockhampton (Gracemere) all the way to Emerald. This area may include localities that you may not wish to class as rural, as well as localities which are rural. An alternative solution may be to classify rural as a designated distance from a designated metro centre.
	6.	Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.	We agree with the AEMO proposal in principle, and in particular the application to Type 1-4 meters. However, we seek clarification if this is also intended to apply retrospectively to Type 6 meters. If it is intended to apply to Type 6 meters we note this would incur significant expense.
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	Energex and Ergon MDP/LNSP utilise this field for the Time of Use Splits on COMMS metering to bill correctly. It should be noted that the information provided is specific to Energex and Ergon. Energex and Ergon LNSP utilise this field to advertise retrospective dates relating to tariff

Information Category	Question No.	Question	Participant Comments
			changes – this information is utilised by other Market Participants. Metering Dynamics do 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.	No comment.
	9.	Do you agree with retaining the Network Additional Information field?	We do not object to retaining this field as long as its use is not made mandatory.

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)?	Our preference is for Option 2, as population of this data is currently limited or inaccurate and will eventually become outdated.
Scenario 2: Add a new field (Proposed Fields)	11.	For Added fields, would you prefer Option 1, 2a, 2b, 2c, 3, 4 or 5?	Our preference is for Option 4.

Information Category	Question No.	Question	Participant Comments
	12.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	No comment.
	13.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	No comment.
	14.	If you choose Option 2c, please choose between for i(a) or i(b).	No comment.
	15.	Do you have any further comment regarding the above?	We agree to work with AEMO to populate the required fields as necessary.
Scenario 3: Amend an existing field (To Amend)	16.	For Amended fields, would you prefer Option 1, 2a, 2b, 3, 4 or 5?	Our preference is for Option 4.
	17.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	No comment.
	18.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	No comment.
	19.	Please provide any further details required	We agree to work with AEMO to populate the required fields as necessary.

Information Category	Question No.	Question	Participant Comments
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	Our preference is for Option 2.
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	We do not have an alternative method of receiving Outbound Notifications.

2.3 Other Matters

Information Category	Question No.	Question	Participant Comments
Consumer Data Right	22.	Do you agree with the proposed new fields?	We support the two new fields.
	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?	We suggest that requests for data for multiple NMIs (multiple customers or multiple NMIs for one customer) where only one authorisation has been given would raise complexities requiring resolution. It is unclear how it could be determined if authority for all NMIs is legitimate.
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	If an LNSP is notified of a change of account holder we would initiate an NTC where the tariff has been grandfathered, i.e. solar.
	25.	Do you agree with the timeframe for updating the data in these fields?	We have no objections to the proposed timeframes.
	26.	Are there other suggestions to help meet the ACCC's objective?	We seek clarity as to where in MSATS these fields will be located, and how the FRMP will update them. Our preference is that these details are provided via a CDN.
	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	We largely experience the lack of valid NTC or incorrect NTCs. For example, when using 'Not Applicable', providing the incorrect Load Control Tariff, or nominating random tariffs without any confirmation when performing metering updates

Information Category	Question No.	Question	Participant Comments
			in the Market creates additional work for the Retailer and LNSP to rectify incorrect tariffs. Further, using invalid or incorrect NTCs on MSW requests requires either follow up with the requesting FRMP or utilising a default NTC as advertised by the LNSP or determined from the MSATS NTC table. Finally, we have also experienced issues relating to application of grandfathered NTC's and application of NTC for metering alterations where the FRMP has supplied a NTC per initial requests and the LNSP has since updated the NTC, leading to multiple NTC changes / corrections.
	28.	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. 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	We support the current process which places cascading obligations for the NTC on all parties. Initially the Retailer and MPB should advertise the NTC correctly to the Market. LNSPs would then validate the NTC and make changes accordingly if required. However, we suggest that 5 business days is a more appropriate timeframe to correct the NTC. Should AEMO choose to further review the obligations on the NTC we suggest that additional consultation would be prudent.

Information Category	Question No.	Question	Participant Comments
		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	
	29.	Do you have any comments on the options provided by Endeavour Energy?	We do not believe that Option 2 is practicable as it is common to have multiple NTCs applicable at a metering installation (e.g. principle, controlled load and generation tariffs). As such, we believe the NTC should stay on the meter level and not at the NMI level. This would enable clarification of multiple NTCs on multiple meters attached to a NMI. We suggest AEMO consider the impact any further changes will have on network expenditure under approved regulatory determinations.

3. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments
	We have no further comments on this matter. Separate feedback has been provided in the Standing Data for MSATS documents regarding suitable fields to be utilised moving forward.

4. Proposed Changes in MSATS Procedures - CATS

Section No/Field Name	Participant Comments
	We have no further comments on this matter. Separate feedback has been provided in the Standing Data for MSATS documents regarding suitable fields to be utilised moving forward.

5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments
Section 4 / Various	We believe the following fields should not be required for NCONUML: • CurrentTransformerLocation • CurrentTransformerType • Manufacturer • Model We suggest the NCONUML is added to the NOT USED list.
Section 4 / GPS*	We note that the Standing Data for MSATS document does not agree with 4.6.3 in DRAFT determination report in relation to when the information is mandatory. However, we recommend no further updates are required in Standing data for MSATS document.
Section 4 / ReadTypeCode	We believe that ReadTypeCode does not cater for Type 7 and NCONUML NMIs when this field is REQUIRED. We suggest that further enumerators are added to the listing to reflect these NMI classification codes appropriately.
Secton 4 / Use	We believe that Use does not cater for Type 7 and NCONUML NMIs when this field is REQUIRED. We suggest that further enumerators are added to the lisiting to reflect these NMI classification codes appropriately.
Section 4 / Next Scheduled Read Date	We would like confirmation on whether Next Scheduled Read Date is required to be populated for NCONUML NMIs. Note that we believe that this should not be populated for NCONUML given that actual metering data will be provided to the market each trading day.

Section No/Field Name	Participant Comments
Section 4 / Various	We believe that the following fields should not be required for NCONUML: • VoltageTransformerLocation • VoltageTransformerType • VoltageTransformerRatio We suggest that NCONUML is added to the NOT USED list.
Section 7 / Shared Isolation Point Flag	We believe that the SharedIsolationPointFlag should not be MANDATORY for NCONUML.
Section 11	We note that the heading on Column 1 of Table 18 Valid Test Result Codes incorrectly shows ControlledLoad.

6. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Version Control	We note that the MSATS Procedures: CATS and MSATS Procedures: WIGS documents are very difficult to review when it does not consider the 5-minute Settlement and Global Settlement changes, with issue of XBOUNDARY being discussed in Procedures but NCONUML not present.