

MSATS Standing Data Review

- MSDR Second Draft Determination and Report
- MSATS Procedures – WIGS
- MSATS Procedures – CATS
- Standing Data for MSATS Guideline
- Retail Electricity Market Procedures Glossary & Framework
- Exemption Procedure Meter Installation Malfunctions
- Metrology Procedure Part A

CONSULTATION – Second Draft Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Endeavour Energy

Completion Date: 27/07/2020

Table of Contents

- 1. Context 3
- 2. Questions raised in the MSATS Standing Data Review Second Draft Report..... 3
- 3. Proposed Changes in MSATS Procedures – CATS 4
- 4. Proposed Changes in MSATS Procedures - WIGS 5
- 5. Proposed Changes in Standing Data for MSATS Guideline 6
- 6. Proposed Changes in Metrology Procedure Part A.....10
- 7. Proposed Changes in Exemption Procedure Meter Installation Malfunctions12
- 8. Proposed Changes in Retail Electricity Market Procedures - Glossary and Framework12
- 9. Other Issues Related to Consultation Subject Matter13

1. Context

This template is to assist stakeholders in giving feedback to the questions raised in the Second Draft Report about the proposed changes to the MSATS Standing Data, and to the second draft changes highlighted in **YELLOW** in the change marked versions of the different procedures and guidelines released in the second draft stage of consultation.

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

2.1 Material Issues

Information Category	Question No.	Question	Participant Comments
Metering Installation Transformer Information	1.	The proposed CT/VT fields values and validations, as listed above, are provided as examples to stimulate feedback from participants. AEMO notes some feedback that options are missing for CT Types, to allow for HV CTs and LV Special CTs. What is the list of values and validations that you need or want for the enumerated list for the various CT/VT fields? (In the absence of any such feedback, the list proposed by AEMO would provide the initial values for the CT/VT fields)?	We confirm that the values proposed is appropriate for us.

3. Proposed Changes in MSATS Procedures – CATS

Please provide feedback to the the changes highlighted in yellow in the change marked version of the document

Section No/Field Name	Participant Comments
-----------------------	----------------------

4. Proposed Changes in MSATS Procedures - WIGS

Please provide feedback to the the changes highlighted in yellow in the change marked version of the document

Section No/Field Name	Participant Comments
-----------------------	----------------------

5. Proposed Changes in Standing Data for MSATS Guideline

Please provide feedback to the the changes highlighted in yellow in the change marked version of the document

Section No/Field Name	Participant Comments
Table 3 CATS_METER_REGISTER	<p>We note that there are 3 fields for test dates: CurrentTransformerTestDate, VoltageTransformerTestDate and LastTestDate</p> <p>However there is only 1 field for the test result: TestResult, with the description of this field linked to the LastTestDate field.</p> <p>For completeness and avoidance of any confusion there should test result fields corresponding to the CT test and VT test. Therefore, we suggest that 2 new fields be added: CurrentTransformerTestResult and VoltageTransformerTestResult, with the same allowable values as the TestResult field.</p>
Table 3 CATS_METER_REGISTER	<p>AEMO provided a response to one of Endeavour Energy's feedback on the 1st draft determination as follow:</p> <p>"AEMO clarifies that ReadTypeCode field does not apply to all meter types and hence proposes it to be REQUIRED."</p> <p>We note that AEMO has not updated the document to explain which meter type requires the ReadTypeCode to be populated. For clarity we suggest AEMO defines when a ReadTypeCode is required.</p>

Section No/Field Name	Participant Comments
<p>Table 3 CATS_METER_REGISTER</p>	<p>AEMO stated in their report that “AEMO will make GPS coordinates Required for all NMIs for three years (36 months) from the effective date, then Mandatory thereafter, to enable a suitable transition period for collection”.</p> <p>However, this is not reflected in the Standing Data for MSATS document.</p> <p>We suggest AEMO updates the Standing Data for MSATS document to reflect AEMO’s decision.</p>
<p>Table 6 CATS_NMI_DATA</p>	<p>We agree with making the ConnectionConfiguration at the metering installation level, as opposed to the meter level. We also agree with the removal of the last 2 characters of this field as it would be a duplicate of the transformer information in the meter register table.</p> <p>However, we disagree with making the ConnectionConfiguration the responsibility of the LNSP because the LNSP is not aware of the Phases In Use information. For example, it is not uncommon for premises to be supplied with 3 phases but only use 1 phase. This practice allows for an easier future service upgrade and is cost effective because it is done during the building stages of the premises. The only party that would have this information would be the MP because they have to install metering equipment that aligns with the number of phases used at the premises. The MP would also be aware if the connection is LV or HV because they have to install metering equipment that aligns with the connection type. We believe that the obligation for populating the ConnectionConfiguration should be with the party that has the information, therefore this field should be the responsibility of the MP.</p> <p>We also suggest that the CATS Procedure gets updated accordingly.</p>

Section No/Field Name	Participant Comments
Table 6 CATS_NMI_DATA	<p>Regardless of who is responsible for the ConnectionConfiguration this information would not be known at the time the NMI is created in MSATS. Therefore, this field should be made Required, as opposed to being Mandatory. If AEMO insists on making this field Mandatory then there must be values allowed for each character to reflect an 'unknown'.</p> <p>We also suggest that the CATS Procedure gets updated accordingly.</p>
Table 8 CATS_REGISTER_IDENTIFIER	<p>The TimeOfDay field has the following description added:</p> <p>For Interval meters, use code "INTERVAL"</p> <p>We disagree with this addition because it does not provide any meaningful information – an interval meter can be determined by the InstallationTypeCode field. In addition, it precludes the provision of more meaningful information by providing one of the other values.</p> <p>Since the value of INTERVAL provides no meaningful information it should be removed. If AEMO insist on maintaining the INTERVAL value then the above statement should be removed to allow the MP to determine which value to provide.</p>

Section No/Field Name	Participant Comments
Table 16 Valid Time of Day Codes	<p>For the INTERVAL value the following was added: used for all Interval metering</p> <p>We disagree with this addition because it does not provide any meaningful information – an interval meter can be determined by the InstallationTypeCode field. In addition, it precludes the provision of more meaningful information by providing one of the other values.</p> <p>Since the value of INTERVAL provides no meaningful information it should be removed. If AEMO insist on maintaining the INTERVAL value then the above statement should be removed to allow the MP to determine which value to provide.</p>
Table 46 CATS_NMI_Data	The Shared Point Isolation Flag has a browser format of CHAR(10), this should be VARCHAR2(10)

6. Proposed Changes in Metrology Procedure Part A

Please provide feedback to the the changes highlighted in yellow in the change marked version of the document

Section No/Field Name	Participant Comments
14. SHARED FUSE ARRANGEMENTS	The AEMC’s ERC0275 final rule states that the “Local Network Service Providers to record all connection points with shared fuse arrangements as soon as practicable after becoming aware of

Section No/Field Name	Participant Comments
	<p>the shared fuse arrangements” (NER clause 7.16.3.c.7.ii of the final rule for Introduction of Metering Coordinator Planned Interruptions).</p> <p>However, clause 14.a stipulates that the LNSP must identify Shared Fuse Arrangements. We believe that using the term ‘identify’ in defining this new obligation is more than what is required by the rules, which is to record Shared Fuse Arrangements when the LNSP becomes aware. The term ‘identify’ suggests that the LNSP must actively confirm if a Shared Fuse Arrangements exists or not, which is not only costly but also was not the intent of the Rules as per the AEMC statement “DNSPs should not be expected to proactively inspect sites to gather this information for all of their customers, but should record it if they become aware of it.” (Page 39, Final Determination on Introduction of Metering Coordinator Planned Interruptions).</p> <p>We therefore suggest that clause 14.a be reworded to:</p> <p>Local Network Service Providers (LNSPs) must, when they become aware, record and maintain Shared Fuse Arrangements through the Shared Isolation Point Flag in MSATS for every connection point that is part of each specific Shared Fuse Arrangement, as specified in the NER and the MSATS Procedures.</p>
<p>14. SHARED FUSE ARRANGEMENTS</p>	<p>We note that the AEMC stated Shared Fuse Arrangements information “... should be used to provide an indication of where shared fusing may apply, but it is not expected that this information would be audited to determine validity due to costs and the administrative burden that auditing the data would impose.” (Page 39, Final Determination on Introduction of Metering Coordinator Planned Interruptions).</p> <p>Therefore, for the avoidance of any doubt we suggest the following sentence be added to clause 14.b:</p>

Section No/Field Name	Participant Comments
	The LNSP is not required to audit the Shared Fuse Arrangement information received from the FRMP or MC.

7. Proposed Changes in Exemption Procedure Meter Installation Malfunctions

Please provide feedback to the the changes highlighted in yellow in the change marked version of the document

Section No/Field Name	Participant Comments

8. Proposed Changes in Retail Electricity Market Procedures - Glossary and Framework

Please provide feedback to the the changes highlighted in yellow in the change marked version of the document

Section No/Field Name	Participant Comments
5. GLOSSARY Controlled Load	A controlled load can be controlled by a metering installation or a network device. Also a controlled load must be separately metered from the remaining load at a metering point. Therefore for clarity we suggest that the definition of 'controlled load' be updated to:

Section No/Field Name	Participant Comments
	Load that is controlled by the metering installation or a network device and is separately metered from the remaining load at a metering point. The majority of Controlled Loads are associated with off-peak hot water, pool pumps and conditioning units.
5. GLOSSARY Shared Fuse Arrangement	The Shared Point Isolation Flag is proposed to be in the CATS_NMI_Data table, which is not at a meter level. Therefore, for avoidance of confusion we suggest removing the last part of the definition and update the definition to be: Shared Fuse Arrangement is covered by the Shared Point Isolation Flag in MSATS

9. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Meter Malfunction Exemption Details	We note that AEMO will consider adding a reason/category for the Meter Malfunction Exemption, which may contain Family Failure as an option, at the time AEMO works on the exemption automation. We support the addition of this information and making it available in MSATS. This information will help participants better understand the nature of the malfunction and start an appropriate discussion with the MC if required.
Shared Fuse Arrangement	The AEMC stated "The Commission recommends that retailers access to NMI Standing Data, in particular to the current retailer (or FRMP) be reviewed, and AEMO investigate the development

Heading	Participant Comments
	<p>of a NMI Discovery Search 4 which would provide retailers with this data for the express purpose of coordinating retailer planned interruptions where there is shared fusing only." (Page 57, final determination for Introduction of metering coordinator planned interruptions).</p> <p>We suggest that AEMO re-consider our suggestion to introduce a Shared Isolation Point ID and NMI Discovery 4 in our previous feedback.</p>
Structure and scope of documents	<p>AEMO provided a response to one of Endeavour Energy's feedback on the 1st draft determination as follow:</p> <p>AEMO clarifies that the Standing Data for MSATS is not a guideline, it is an MSATS Supporting Document as per section 4.2 of the Glossary and Framework Document.</p> <p>We believe that a supporting document cannot contradict the procedural document it is supporting and that a supporting document cannot place additional obligations on participants when compared to the procedural document it is supporting.</p> <p>The Standing Data for MSATS document is evolving to include more obligations in which participants are expected to comply with that is not already defined in a corresponding procedure.</p> <p>For the avoidance of any confusion we encourage AEMO to consider the structure of their library of documents to ensure that obligations are captured in procedures and not supporting documents. We note that the majority of sections 4 to 11 of the Standing Data for MSATS document is primarily defining obligations, for example who has to provide the data, when the data is required and what values must be provided for specific metering installation configurations, and therefore should be in the CATS procedures. The majority of section 12 onwards of the Standing Data for MSATS document is primarily defining technical matters and</p>

Heading	Participant Comments
	<p>providing examples and therefore could be in a supporting document like the Standing Data for MSATS.</p> <p>In addition, by leaving clauses that define obligations in a supporting document means that AEMO does not have to follow the Rules consultation procedures (as defined in section 8.9 of the NER) and therefore means that changes can be made with minimal consultation – this has occurred before and we believe is not in alignment with the intent of the Rules, which is any obligations market participant must comply with should be in a procedure and any changes to that procedure must follow the Rules consultation procedures.</p>