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: Red Energy and Lumo Energy

Completion Date: 27/07/2020

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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

Information	Q No.	Question	Participant Comments
Category			
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)?	No comment at this time.

2.1 Material Issues

3. Proposed Changes in MSATS Procedures – CATS

Section No/Field Name	Participant Comments
2.2(r)	The timeframe proposed in the final determination for the 'Introduction of Metering Coordinator Planned Interruptions' provides for information to be updated 'as soon as practicable'. As a result, Red and Lumo strongly

	object to this addition and propose it be removed: (r)Notify the LNSP of any connection point that has a Shared Fuse Arrangement within two business days of becoming aware of the Shared Fuse Arrangements. A retailer will notify the LNSP via a B2B transaction, requesting it to perform a 'temporary isolation group supply'. On that basis, the retailer does not also need to advise the LNSP via a CATS transaction. Moreover, as it already is an obligation in the Metrology Procedures, it does not need to be duplicated into the CATS Procedures.
2.2(s)	Object to this clause being added. See feedback as per 2.2(r)
2.3(r)	No comment at this time.
2.3(s)	No comment at this time
2.3(t)	No comment at this time
2.6(k)	Object to this clause being added. See feedback as per 2.2(r)
2.6(I)	Object to this clause being added. See feedback as per 2.2 (r)
2.9(k)	No comment at this time
9.3.4(c)	No comment at this time
9.3.4(e)	No comment at this time
9.4.4(c)	No comment at this time
9.4.4(d)	No comment at this time
10.1.4(c)	No comment at this time
10.1.4(e)	No comment at this time
10.2.4(g)	No comment at this time
10.3.4(h)	No comment at this time

10.4.4(d)	No comment at this time	
10.4.4(g)	No comment at this time	
10.5.4(d)	No comment at this time	
10.5.4(g)	No comment at this time	
15.1.4(f)	No comment at this time	
Table 16-C	No comment at this time	

4. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments
4.3.4(c)	No comment at this time
4.3.4(h)	No comment at this time
5.2.4(c)	No comment at this time
5.2.4(d)	No comment at this time
5.3.4(f)	No comment at this time
5.4.4(f)	No comment at this time
9.1.4(b)(iii)	No comment at this time

5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments
Table 3 CATS_METER_REGISTER	No comment at this time
Table 6 CATS_NMI_DATA	No comment at this time
Table 8 CATS_REGISTER_IDENTIFIER	No comment at this time
Table 15 Valid Meter Use Codes	Red and Lumo would like to point out that Solar / PV seems to have been missed out or not included from the valid meter codes, however, it was confirmed in the first draft as a required option. We would also suggest that an additional option of Solar / PV Controlled be considered to differentiate between controlled and uncontrolled Solar.
Table 16 Valid Time of Day Codes	No comment at this time
Section 13	No comment at this time
Table 43 CATS_Meter_Register	No comment at this time
Table 46 CATS_NMI_Data	No comment at this time
Table 49 CATS_Meter_Register	No comment at this time
Table 52 CATS_NMI_Data	No comment at this time

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	In line with feedback provided to the MSATS CATS Procedures 2.2 (r) and 2.2 (s), the obligation should be taken out of the CATS Procedures and therefore the Metrology Procedure does not need to point to it. Wording to be changed as follows:
	(b) Financially Responsible Market Participants (FRMPs) and Metering Coordinators (MCs) must notify the Local Network Service Providers (LNSPs) of any new Shared Fuse Arrangements or any changes to existing Shared Fuse Arrangements for the connection points relevant to them, as specified in the NER. and the MSATS Procedures.

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
1.1	No comment at this time
2.2	No comment at this time
Appendix A	No comment at this time
Appendix B	No comment at this time

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

Section No/Field Name	Participant Comments
5. GLOSSARY - Shared Fuse Arrangement	No comment at this time

9. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
8.2 Network Tariff Code	In relation to question 29 to comment on options 1 and 2 provided by Endeavour Energy:
	AEMO misrepresented the views of Red Energy and Lumo Energy in its Second Draft Report and Determination
	Red and Lumo support for option 1, with a further requirement for there to be an obligation on the MPB to update the NTC in the event of works they have undertaken themselves, such as metering change.
	However, in its summary AEMO noted that Red Lumo supported option 1 but this was followed by 'Option 2 was not supported byRed Lumo for specified reasons, but nor did they indicate support for Option 1'. These two statements contradict each other and are not representative of the response by us.
	We strongly support a timely consultation on the NTC, which we highlighted in our initial response. As noted in our initial response, there is a large volume of NTCs that are incorrect and once AEMO's consultation is finalised, there will be a large volume to be rectified. As many retailers base their retail tariffs on network tariffs, this will have a direct impact on consumers. Timely rectification of this issue is essential.